IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

FIRST APPELLATE DISTRICT

DIVISION FOUR

CHURCH OF SCIENTOLOGY, INTERNATIONAL, Plaintiff/Respondent, vs. GERALD ARMSTRONG, Defendant/Appellant.	)	NO. A075027

CLERK'S TRANSCRIPT ON APPEAL

FROM A JUDGMENT MADE AND ENTERED

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

VOLUME 28

For the Plaintiff/Respondent:

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

DEPARTMENT 1

CHURCH OF SCIENTOLOGY, INTERNATIONAL,)
Plaintiff,)
)
vs.)
)
GERALD ARMSTRONG,)
Defendant.)

No. 157680

GARY W. THOMAS	JUDGE
JOHN P. MONTGOMERY	COURT EXECUTIVE OFFICER
ELAINE PASSARIS	REPORTER

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CHRONOLOGICAL INDEX NO. 157680, VOL. 28 MARIN NO. 157680

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 56 HON. BRUCE R. GEERNAERT, JUDGE

CHURCH OF SCIENTOLOGY OF CALIFORNIA,
PLAINTIFF,
VS.
GERALD ARMSTRONG,
DEFENDANT.

CASE NO. C 420 153

RECEIVED
JAN 31 1992
HUB LAW OFFICES

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, DECEMBER 23, 1991

APPPEARANCES:

(SEE APPEARANCE PAGE.)

COPY

HERBERT CANNON, CSR NO. 1923
OFFICIAL REPORTER

7700

THEY CONSIDERED TO BE APPROPRIATE FOR THE COURT ORDER AND THEN I GO OVER THEM AND SAY IS THIS REALLY SOMETHING THAT IS THE BUSINESS OF THE COURT TO BE ORDERING AND ENFORCING WITH CONTEMPT OR NOT?

AND I MAKE SURE THAT IT IS THE KIND OF CLEAR AND CONCISE ORDER THAT CAN BE THE SUBJECT OF A CONTEMPT PROCEEDING. SO MY BELIEF IS JUDGE BRECKENRIDGE, BEING A VERY CAREFUL JUDGE, FOLLOWS ABOUT THE SAME PRACTICE AND IF HE HAD BEEN PRESENTED THAT WHOLE AGREEMENT AND IF HE HAD BEEN ASKED TO ORDER ITS PERFORMANCE, HE WOULD HAVE DUG HIS FEET IN BECAUSE THAT IS ONE OF THE -- I HAVE SEEN -- I CAN'T SAY -- I'LL SAY ONE OF THE MOST AMBIGUOUS, ONE-SIDED AGREEMENTS I HAVE EVER READ. AND I WOULD NOT HAVE ORDERED THE ENFORCEMENT OF HARDLY ANY OF THE TERMS HAD I BEEN ASKED TO, EVEN ON THE THREAT THAT, OKAY, THE CASE IS NOT SETTLED.

I KNOW WE LIKE TO SETTLE CASES. BUT WE DON'T WANT TO SETTLE CASES AND, IN EFFECT, PROSTRATE THE COURT SYSTEM INTO MAKING AN ORDER WHICH IS NOT FAIR OR IN THE PUBLIC INTEREST.

SO BASICALLY, I HAVE TO CONCLUDE BASED ON THE RECORD THAT THERE WAS NO ORDER; SIMPLY, HE WASN'T PRESENTED THE ORDER. HE WAS NOT ASKED TO ORDER ITS PERFORMANCE. HE DIDN'T ORDER ITS PERFORMANCE.

THE FIRST TIME THAT WOULD BE DONE WOULD BE IN RESPONSE TO YOUR MOTION AT THIS TIME.

MR. HERTZBERG: JUDGE, LET ME RESPOND TO THAT.

FIRST OF ALL, I THINK YOUR HONOR KNOWS WE ARE NOT CLAIMING THAT JUDGE BRECKENRIDGE SO ORDERED THE TERMS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 56 HON. BRUCE R. GEERNAERT, JUDGE

CHURCH OF SCIENTOLOGY OF CALIFORNIA,

PLAINTIFF,

VS.

GERALD ARMSTRONG,

DEFENDANT.

CASE NO. C 420 153

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) SS
COUNTY OF LOS ANGELES)

I, HERBERT CANNON, OFFICIAL REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING PAGES, 1 THROUGH 77, COMPRISE A TRUE AND CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD IN THE ABOVE-ENTITLED MATTER ON DECEMBER 23, 1991.

DATED THIS 6TH DAY OF JANUARY, 1992.

Herbert Cannon

OFFICIAL REPORTER CSR NO. 1923

7702

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

AND RELATED CROSS-ACTION.

NO. 152-229

vol 28

DEPOSITION OF:

MICHAEL DOUGLAS

VOLUME I - AUGUST 30, 1994 - PAGES 1-53

VOLUME II - SEPTEMBER 2, 1994 - PAGES 54-164

Reported by:
PENNY L. GILMORE
CSR NO. 4724

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FRIDAY, SEPTEMBER 2, 1994 9:15 A.M.

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EXAMINATION RESUMED BY:

MR. GREENE: Back on the record.

Q. Good morning, Mr. Douglas, we're resuming your deposition that we continued from Tuesday, whatever day that was. I think it was the 29th. You are still under oath and I'll proceed, I believe, where I left off.

A. You were just pointing towards the Settlement Agreement.

Q. Okay, that's right.

Mr. Douglas, before you is Exhibit five from the deposition of Nancy Rodes, which is the Settlement Agreement, and I believe the pending question was whether or not you had executed such a Settlement Agreement in December of 1986. And I'm directing your attention to the one executed by Nancy Rodes based on your representation that the copy of yours went up in the Oakland fire of October 20th, 1991.

A. I did execute such an Agreement at about the same time.

Q. Were you paid something in the vicinity of $7500 for it?

A. I believe it was exactly that amount.

Q. You didn't have any pending claim against

Scientology at that time, did you?

A. Correct.

Q. You didn't have any anticipation of bringing any claim against Scientology at the time either, correct?

A. Correct.

Q. Are you familiar with the tenet of Scientology having to do with suppressive persons?

A. Well, I'm not familiar with it but I know about it, something about it.

Q. You knew about it during the course of your 12-year involvement with Scientology, right?

A. Correct.

Q. A suppressive person is declared a suppressive person at some point by Scientology if it's deemed appropriate by the organization, right?

MR. WILSON: Objection, vague and ambiguous. Assumes facts not in evidence.

MR. GREENE: Q. Based on your understanding, based on your understanding and knowledge.

A. Correct.

Q. Such a declaration of suppressive person status can result from someone who impedes the advancement of Scientology, right, according to your understanding?

A. Could be, right.

Q. And according to your understanding somebody could be declared a suppressive person if they impeded the advancement of a particular Scientologist, right?

A. I believe so.

Q. With respect to your understanding of an individual who is in Scientology that has some sort of connection with a suppressive person, such connection would make the person in Scientology be susceptible of characterization as a PTS or potential trouble source according to your understanding, right?

A. Correct.

Q. According to your understanding, someone who is designated a potential trouble source can either handle the difficulty they have in connection with the suppresive person, right?

A. Correct.

Q. And according to your understanding, the person who is a potential trouble source can disconnect from the suppressive person, right?

A. Right.

Q. Those are really the only two choices according to your understanding; is that right?

A. To the best of my recollection.

Q. Now if my recollection is right you indicated that you joined the Sea Org the first year that you became involved in Scientology; is that right?

A. Correct.

Q. And you continued to be a member of the Sea Org through 1980 when you left, right?

A. Correct.

Q. During the course of the period of time when you were in Scientology did you become familiar with something known as fair game?

A. I did.

Q. Did you ever see a particular policy that was generically known as the Policy of Fair Game?

A. I did.

MR. GREENE: I would like to mark this as next in order.

MR. WILSON: I will object on the ground of relevance.

MR. GREENE: The reason it is relevant is because Lynn Farny testified specifically there was no such thing.

MR. WILSON: No, he didn't testify that there wasn't any such thing now.

MR. GREENE: Or then. He said there never has been.

MR. WILSON: I'm going to assume -- I would like a ruling. I would like to make the same objection to this line of questioning I made in the last deposition. I don't want to have to make it again.

MR. BENZ: I'll consider it a standing objection and with the understanding it's overruled.

(Whereupon Defendant's Exhibit 5
was marked for identification.)

MR. GREENE: Q. Mr. Douglas, directing your attention to what's been marked Exhibit number five, have you seen a document like that before?

A. Something like this, yes.

Q. That was during the time that you were in Scientology?

A. Yes.

Q. When you were in Scientology and you saw a document that looked like Exhibit five is that what you understood to be the Fair Game Policy?

A. This is not the document I was thinking of when you questioned me just a moment ago. This document may have been extant at the time I joined the Sea Org in 1968. However, the enemy condition here specifies SP order and fair game. That was not the practice as I understood it at the time amongst the group that I worked in.

Q. At the time when you were involved in Scientology did you understand that Fair Game Policy to mean that somebody who was declared a suppressive person and subject to fair game could be deprived of property or injured by any means by any Scientologist without any discipline by the Scientologist?

A. I did understand that was the policy in writing and there was the possibility of that being applied.

Q. Did you also understand that there was the possibility that what could be applied is a person who was a suppressive person could be tricked, sued or lied to or destroyed?

A. I understood that that was written in policy.

Q. Now your concern with respect to testifying regarding these matters is that it could have an adverse effect on your sister who is a Scientologist, right?

A. Would you repeat?

Q. Your concern about giving testimony with respect to suppressive person and with respect to fair game, as I understood you from earlier this week to have, is based on a concern that you have that in so doing the consequence will adversely affect your relationship with your sister who is a public Scientologist, right?

A. That is partially correct. That's not the whole truth.

Q. What's the rest of the truth?

A. The rest of truth is I am wanting to be careful about my testimony in that I don't want to say it in such a way it will be misconstrued because I have no wish to whether it goes to the interpretation -- well, the interpretation of the Agreement is legitimate, but...

MR. GREENE: That's what it goes to.

MR. BENZ: I'm still going to sustain the objection.

MR. GREENE: Q. At the time that you signed the Settlement Agreement in 1986 you were not represented by Michael Flynn, were you?

A. I'm not sure about that. I'm not sure of all what goes into legal representation, what constitutes it, et cetera. I'm not sure whether he represented me or not. He may have, may not have.

Q. You never hired him to represent you?

A. To the best of my recollection I did not.

Q. In early December 1986 you never had any discussions with Michael Flynn that you can recall regarding the 50,000-dollar damages provision that would apply if you mentioned Scientology to anyone aside from those in your immediate family, did you?

A. I may have had discussions like that. I mean, a 50,000-dollar hit, especially at that time, would have been sort of daunting to me and I would sort of like to know about it and have some sort of understanding. I did have discussions with Flynn, talked to him physically and that may have been a subject of our conversation.

CERTIFICATE OF DEPOSITION OFFICER

I, PENNY L. GILMORE, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that MICHAEL DOUGLAS, the witness in the foregoing deposition, was by me duly sworn to testify the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein stated, that the testimony of said witness was reported by me, a Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed into computer-assisted transcription under my direction.

I futher certify that I am not of counsel or attorney for either or any of the parties in the foregoing depositon and caption named, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 3rd day of October 1994.

DEPOSITION OFFICER, CSR NO. 4724

I hereby certify this copy is a
true and exact copy of the
Original.

Penny L Gilmore

DEPOSITION OFFICER, CSR NO. 4724

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff,	
vs.	NO. 152-229
GERALD ARMSTRONG; DOES 1 through 25, inclusive, Defendants.	
AND RELATED CROSS-ACTION.	

DEPOSITION OF:

NANCY RODES

Tuesday, August 30, 1994

Reported by:
PENNY L. GILMORE
CSR NO. 4724

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MR. GREENE: I'd like to mark this next as number three.

(Whereupon Defendants' Exhibit 3
was marked for identification.)

MR. GREENE: Q. Okay, Nancy, if you would look at Exhibit three there that the Court Reporter has just passed to you and take a few moments to review that document, please.

A. Yes.

Q. Are you familiar with Exhibit three?

A. Yes.

Q. You have seen that document before?

A. Yes.

Q. On page five, which is the second from the last page, there's a row of signatures and your former married name appears at the top of the signature line and date to its right. Do you see that?

A. Yes.

Q. Is that your signature?

A. Yes.

Q. Do you recall signing Exhibit three?

A. Yes.

Q. Do you recall signing Exhibit three on December 5th, 1986?

A. Yes.

and I asked to have my money returned. I demanded they return my money and they did within a period of I believe several weeks.

Q. Directing your attention to Exhibit three, which is what's in front of you, page two of it --

A. I'm sorry, page three? Page two, you just said.

Q. You are at the top of the list there with an amount of $7500 after your name?

A. Yes.

Q. Did you receive $7500?

A. Yes, I did.

Q. What was that $7500 for? Strike that, let me ask you this way: That $7500 was not for any money that you felt Scientology owed to you, was it?

A. No, it was not.

Q. In fact, Scientology didn't owe you in your mind anything as of December 1986, did it?

A. Well, I had no intention of making a claim against Scientology. There was not a clear-cut issue of the Church of Scientology owing me anything. If I looked at it I'm sure there are issues of being underpaid and not having Social Security payments and, you know, like that. I could have, I certainly could make a case that the Church of Scientology owed me something but I didn't. I was not considering making a claim for that at the time.

Q. Did you have any understanding as of early or as of December 1986 of a concept called a statute of limitations?

A. I'm aware there is a statute of limitations.

Q. Did you have any understanding --

A. And I was, that was your question, if I did, if I had that understanding, yes.

Q. My next question with respect to the understanding that you did have, was it your further understanding that any claim that you may have had against Scientology was barred by the statute of limitations?

A. I thought that to be the case.

Q. Now let's mark this as Exhibit four, please, which is the subpoena.

(Whereupon Defendants' Exhibit 4
was marked for identification.)

MR. GREENE: Q. Nancy, Exhibit four is a subpoena that's got your name on it. Is that what brought you here today?

A. Yes, it is.

Q. The subpoena required that you bring certain documents with you; was that your understanding?

A. Yes, it is.

Q. You have brought a certain document entitled Mutual Release Agreement in response to that subpoena, haven't you?

A. Yes.

Q. I would like to mark this as Exhibit five.

A. That will be returned to me, won't it?

Q. Yes, what we'll do is we'll make a copy. How shall we do that?

Nancy, let me ask you, is this an original document or a copy of a document according to your understanding, proposed Exhibit five?

A. It's a copy.

Q. If we stamp this as an exhibit and return a copy to you would that be adequate for you?

A. Yes.

Q. Then what I would like to do is mark this Mutual Release Agreement now as Exhibit five.

(Whereupon Defendants' Exhibit 5 was marked for identification.)

MR. GREENE: Q. Now, directing your attention to Exhibit five, would you -- first of all, do you recognize that document?

A. Yes, I do.

Q. What do you recognize that document as being?

A. A Mutual Release Agreement which I signed.

Q. Did you receive $7500 for having signed Exhibit five?

A. Yes.

Q. That's the $7500 that's referred to on page two of Exhibit three, right?

A. Yes.

Q. Where were you when you signed Exhibit five?

A. Los Angeles.

Q. Did you sign Exhibit five at or about the same time as you had signed Exhibit three?

A. Yes.

Q. At the time that you signed Exhibit five was it your understanding that the $7500 you were paid required you to comply with the terms and conditions set forth in Exhibit five?

A. Well, I had a conversation with Mr. Flynn, Michael Flynn, in which I expressed serious reservations about signing it. I felt like I was giving up my freedom of speech and just normal rights and ability to function. And Mr. Flynn basically indicated that he didn't feel that that aspect of the Agreement would stand up because I was very concerned about the idea of not being able to communicate what was a part of my life what I believed to be true. I actually felt like I didn't want to do it. I had real reservations about doing it. I don't to this day feel very good that I did that, to be honest. But I did understand this Agreement. I realized that I was signing it.

Q. Let me ask you some more questions about it. At the time you signed the Agreement you weren't involved in any litigation against the Church of Scientology, were you?

A. No, I was not.

Q. You had not employed a lawyer to represent you with respect to any litigation connected to Scientology, right?

A. Right.

Q. At the time you signed the Agreement were you in fact represented by any lawyer?

A. No.

Q. Prior to signing the Agreement you had testified in the trial before Judge Breckenridge, right?

A. Correct.

Q. Do you recall during the course of the trial testifying about when you wanted to leave Scientology in 1978?

A. Yes, I recall.

Q. Do you recall testifying about what happened to you when you said that -- Strike that.

When you wanted to leave Scientology in 1978 did you advise any other individuals in Scientology of your desire to do so?

A. Well, the basis of my impression is that I expressed misgivings and said I felt uncomfortable about signing it and I wasn't really clear and sure I wanted to sign such a statement.

Q. To whom did you say that?

A. Michael Flynn. And he kind of argued and made a case for signing it. If it didn't matter to the whole agreement then it would seem to me that he would let me go: If you don't feel comfortable about signing it, don't sign it.

Q. Did you tell him specifically that you didn't want to sign it?

A. Well, I didn't say I do not want to sign this. I said I really feel uncomfortable about this, it's like giving up my freedom, you know, who I am as a person -- not who I am but an aspect of my life and my ability to communicate.

Q. Do you recall Flynn's response to that?

A. Basically the whole thing, the troops need to go home; it's hard; so many people, you know, and people's psychological state was, you know, perhaps edgy and just it had been such a long, drawn out ordeal; his whole life had been turned upside down and it just needed to end, kind of thing. And also it's not really enforceable; it's not really -- no legal document can really take away your rights.

Q. Let's talk about what the rights were that you felt were hurt or at risk for being hurt if you signed Exhibit five.

A. Well, I felt that my freedom of speech, my freedom to express myself -- I didn't have any specific plans to, you know, be interviewed or write a book or anything like that, but you just don't know. And this was stating in very broad general terms that I couldn't discuss it and it felt like it would suppress my ability to discuss something that had been a large part of my life.

Q. Did you feel like that was going to be extremely difficult to live by, not talking about something that had been a big part of your life?

A. It didn't seem like it would be extremely difficult to live by because it seemed like I said whatever I had to say in the trial, and whatever. And I didn't have so much to say, so much knowledge. And that common sense just dictated that if I was in a close, intimate relationship with somebody I would be able to say I was in it. The thrust was primarily that I wouldn't go to the news, the media, like that.

I thought as long as I'm low key, low profile and they don't feel like I've attacked or didn't discredit them, or whatever, the chances are there would be no repercussions.

But I also had misgivings. Actually a major part was I have a degree in psychology; I'm interested in helping people and counseling people, and that was part of the whole thing of why I was in Scientology. And I had a couple of conversations with people who for some reason, I don't even quite remember how it came about how I talked to them, were trying to get out of Scientology and were really troubled. And I felt that I could be helpful in that situation. And I also didn't want to limit my ability to do that. That was a part of it, not that I had exact plans for that as a career, but...

Q. Did Mr. Flynn tell you that any portions of the Agreement in his view were not legally enforceable?

A. My recollection is that he said something to the effect -- at least it gave me the understanding that the clause which prevented me from discussing or communicating about my experience in Scientology would not be enforceable.

Q. Do you recall Mr. Flynn telling -- Strike that.

Did you ask Mr. Flynn why he thought that?

A. I think I did but I can't recall his answer. The conversation was kind of quick and hurried. I kind of felt like I wanted a little more. It's like we're going up in the elevator and I think that it had to do with the idea that you cannot take away someone's basic constitutional rights.

Q. That was the idea you got from Mr. Flynn?

A. Yes, and I think there was another legal point that had to do with time, you know, the aspect of kind of unlimited nature something of the clause.

Q. So let me ask you this: Did Mr. Flynn say anything to you to the effect that it was his view that the restrictions that are in this agreement would be enforceable only if they were limited to a specific duration of time?

A. I believe so.

Q. Did he tell you that it was his view that if there was no time restriction with respect to the provisions about being silent that those provisions ultimately would not be enforceable?

A. I believe so, yeah, seems to me.

Q. Do you recall when you first saw Exhibit five after your arrival in Los Angeles?

A. I can't recall the exact moment. I just have a vague sense of being in a room in that hotel and being given it. I'm sorry, I'm just not clear on this.

Q. Do you recall who gave it to you? Do you recall whether there was just one other person in addition to you in the room when the Agreement was first given to you?

A. I vaguely think that there were other people and there were several of us who had -- I really don't recall, really. It's a little bit fuzzy.

Q. Do you recall how much time passed from the point when you were first handed the Agreement and the point when you signed it?

A. I think that it happened that day and it was a matter of hours, but as I --

MR. WILSON: I'm going to object to this line of questioning on the basis of relevance. How much time before she signed it, all these other things have nothing to do with any defense Mr. Armstrong may have, which I understand he has an affirmative defense that Mr. Flynn, as his lawyer, didn't advise him correctly. Even if that's true what happened with Ms. Rodes is not relevant to that. And further, in order to show duress, the law is pretty clear that duress is not the duress of some co-party to the Agreement; it has to be duress of the opposing party. None of this evidence has anything to do with what the Church or Scientology or its lawyers did. Therefore, it's all irrelevant.

MR. BENZ: Mr. Greene?

MR. GREENE: The relevance is it's part of the general course of conduct that was employed by Michael don't clearly remember whether that issue came up. I don't think so. I don't think I had that understanding.

Q. Did anybody tell you prior to going to Los Angeles that you would be required not to travel someplace in order to be able to be served with a subpoena so as to be able to testify?

A. No.

Q. Did anybody tell you that you would be prohibited -- prior to going to Los Angeles, did anybody tell you that you would be prohibited from assisting anyone who ever was adverse to Scientology?

A. I don't believe so.

Q. Prior to going to Los Angeles were you told that you would be expected to keep the terms of the Settlement Agreement secret?

A. I don't think so. Not that I recall.

Q. Prior to going to Los Angeles did anybody tell you that you would be expected to maintain strict confidentiality, with the exception of members of your immediate family, regarding disclosing your knowledge of Scientology?

A. I don't think so.

Q. Prior to signing the Agreement did you read it?

A. Yes.

Q. After you read it was that when you had the discussion with Michael Flynn going up in the elevator in the hotel?

A. Yes.

Q. When you were going up the elevator with Michael Flynn in the hotel was that the only opportunity you had to discuss with Flynn the provisions of the Agreement?

A. I believe so. I think so, yes.

Q. Since signing the Agreement you have not ever gone to the press, have you?

A. No.

Q. You have not ever testified voluntarily, which means not being subpoenaed, have you?

A. No.

Q. But you have discussed with certain friends of yours your experiences in Scientology, have you not?

A. Should I plead the Fifth Amendment or something?

Q. You are not charged with any criminal proceeding; that's what the Fifth Amendment applies to. Would you answer the question?

A. If I'm asked to answer something that they could conceivably sue me and use this as evidence do I have to say that?

Q. I'm afraid you do.

A. Really?

Q. Yes.

A. Yes, I discussed my experience in Scientology with friends and people I am close to at times.

Q. Every time that you have done that have you considered that you could be sued for $50,000 for each such conversation?

A. Well, I don't know that I considered it every time I've done it, but there have been times that that thought has crossed my mind.

Q. Did you, when you spoke with Mr. Flynn in Los Angeles prior to signing the Agreement, have any discussions with him whether or not the 50,000-dollar penalty clause was fair and reasonable?

A. I don't recall any discussions about that whatsoever.

Q. When you read the Agreement -- or strike that.

Upon completing reading the Agreement you didn't really want to sign it, did you?

A. All other things, it didn't feel good to me to sign it. It still to this day doesn't feel good. So, no, I didn't really happily, with no reservations sign it. But I made the decision to sign it. Nobody forced me to sign it. I thought the whole settlement is happening, it's good. I'm sure the $7500 influenced my decision. And I was mentally competent and aware and I did make the decision to do it.

Q. To what extent did your decision to sign the Agreement rely on Flynn's telling you that he thought that the provisions with respect to maintaining silence were not enforceable?

A. I would say that -- I would say that was important to a fairly large extent.

Q. Did you have discussions with any other signatories, any of the other people listed on Exhibit number three prior to your signing the Agreement regarding what you were going to sign?

A. About this Agreement?

Q. Yes.

A. So that day. I don't recall. I don't remember doing so.

Q. After you signed the Agreement you didn't feel free to talk with any of the other people listed on Exhibit three about signing the Agreement, did you?

A. No.

Q. And you didn't have any such conversations, did you?

A. I don't recall having any. You mean ever prior to signing this Agreement did I have any discussion with anybody else signing this Agreement?

Q. Regarding the Agreement.

A. I don't really remember. Seems like the only contains no allegation that the Church of Scientology has done anything that forces any beliefs on Gerry Armstrong, and if that weren't enough, there's absolutely no foundation for the question; there's no evidence that there's been any use of the judicial system to force any religious beliefs on anyone.

MR. GREENE: That's also the subject of a summary judgment motion that's pending before Judge Thomas right now.

MR. BENZ: In the first place, the witness herself may object to it and decline to answer since it -- that would be up to her. I don't believe Scientology is entitled to make the personal objection on behalf of the witness if she decides to go ahead and answer.

Could you read that question back again, please?

(Whereupon the following question was read back: "Did you have a belief in God when you were a Scientologist?")

MR. BENZ: I'll sustain the objection on the grounds whether or not there's a belief in God has nothing to do with the actions of Scientology.

MR. GREENE: All right, I'll ask my next question, then.

Q. My next question, Ms. Rodes, is when you were in Scientology did Scientology allow for the belief in God?

MR. WILSON: Same objection.

MR. GREENE: That goes to the jurisprudence.

MR. BENZ: I'll overrule this objection because the question relates to the action, the directive of Scientology rather than the personal belief of the Scientologist.

THE WITNESS: Scientology didn't allow for or address the question of God.

MR. GREENE: Q. Did Scientology allow for a belief in Jesus Christ when you were inside it?

MR. WILSON: Same objection. Irrelevant. I don't see how this one could be relevant on the basis it's discredible facts. There are plenty of religions that don't allow for the belief in Jesus Christ. I don't think you could contend that that is somehow discredible.

MR. WALTON: We're not talking public policy; we're talking First Amendment.

MR. BENZ: I'll allow this one but we're getting close to the end of the line.

THE WITNESS: I don't think it ever addressed or allowed for a belief in Jesus, no, it did not.

MR. GREENE: Q. When you were in the Sea Org in Scientology was it permissible to meditate?

MR. WILSON: Same objection.

MR. BENZ: I frankly don't see the relevance of meditation, which is not necessarily connected with religion and, therefore, not necessarily connected with this. The objection is sustained.

MR. GREENE: Q. When you were in Scientology was it permissible to consider a god as the source of everything?

MR. WILSON: Same objection.

MR. BENZ: Overruled..

THE WITNESS: Was it permissible. That's a very -- there was no stricture that said you were not allowed to believe in God yet it was never addressed; it wasn't encouraged. It just wasn't in the picture, and if -- I suppose if somebody was a Scientologist and they really got into talking about belief in God maybe -- I don't know, it would probably be considered other practices; it's not Scientology.

MR. GREENE: Q. If it were considered other practices, how would other practices be treated by Scientology according to your experience and knowledge having been in it?

MR. WILSON: Objection. First of all, it's irrelevant. Second of all, you are asking the witness to speculate because what she said was it wasn't addressed and she supposed if someone started talking about believing in God then it might be considered other practices. So we have a question that's based on speculation of the witness at its foundation.

MR. GREENE: I think you are right. Let me incorporate your objection and try it from this angle.

Q. What do you mean when you say "other practices"?

A. Well, in Scientology I would say that it's safe to say that you more or less weren't allowed to engage in other practices, and at least if you were it would be considered something is wrong here and you had to straighten out this person. You were either doing Scientology and following its creed and code and its processing or there was a problem.

Q. If there was a problem would the person with the problem be subject to ethics consideration in Scientology?

A. I don't know, it depends. If they went to Celebrity Center and gave The Church a lot of money they probably would be left alone. If it seemed like it might create a problem and Scientology might not have control over that person because of that, then they would probably try to handle them.

MR. WILSON: Objection, move to strike. Lack of foundation. We have a witness, again, 13 years ago testifying as to what happened. She referred to Celebrity Center. That wasn't completed until several years ago.

THE WITNESS: Not true. Not accurate.

CERTIFICATE OF DEPOSITION OFFICER

I, PENNY L. GILMORE, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that NANCY RODES, the witness in the foregoing deposition, was by me duly sworn to testify the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein stated, that the testimony of said witness was reported by me, a Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed into computer-assisted transcription under my direction.

I futher certify that I am not of counsel or attorney for either or any of the parties in the foregoing depositon and caption named, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 15th day of September 1994.

DEPOSITION OFFICER, CSR NO. 4724

I hereby certify this copy is a
true and exact copy of the
Original.

DEPOSITION OFFICER, CSR NO. 4724

PFL/[✓ DEFT] EXHIBIT 5
WIT: Nancy Rooks
PENNY L. GILMORE, Reporter
8·30·94

MUTUAL RELEASE AGREEMENT

1. This MUTUAL RELEASE AGREEMENT is made and entered into this 5th day of December, 1986 by and between NANCY DINCALCI (hereinafter "DINCALCI") and the Church of Scientology of California.

2. This is a release of the Church of Scientology of California, the Church of Scientology International, The Religious Technology Center, Author Services, Inc., and their officers, agents, representatives, employees, volunteers, directors, successors, assigns and legal counsel, L. Ron Hubbard, his heirs, estate, and his executor, Author's Family Trust, Mary Sue Hubbard, all Scientology organizations and entities and their officers, agents, employees, servants, directors, successors, assigns and legal counsel (all hereinafter collectively referred to as the "releasees").

3. It is understood that this settlement is a compromise of doubtful and disputed claims, and is not an admission of liability on the part of any party to this Agreement, specifically, the Church of Scientology of California, any other Scientology organization or entity, or any of their officers, agents, employees, servants, directors, successors, members, assigns, or legal counsel, by whom liability has been and continues to be expressly denied. In executing this settlement Agreement, DINCALCI acknowledges that she has released the organizations, individuals and entities listed in Paragraph 2 because, among other reasons, they are third party beneficiaries of this Agreement.

4. For and in consideration of the above described consideration, the mutual covenants, conditions and release contained herein, DINCALCI does hereby release, acquit and forever discharge, for herself, her heirs, successors, executors, administrators and assigns, the Church of Scientology of California, Church of Scientology International, Religious Technology Center, all Scientology and Scientology affiliated organizations and entities, Author Services, Inc. (and for each organization or entity, its officers, agents, representatives, employees, volunteers, directors, successors, assigns and legal counsel), L. Ron Hubbard, his heirs, beneficiaries, Estate and its executor, Author's Family Trust, its beneficiaries and trustee, and Mary Sue Hubbard, and each of them, of and from any and all claims, demands, damages, actions and causes of action of every kind and nature, known or unknown, from the beginning of time to and including the date hereof.

5. For and in consideration of the mutual covenants, conditions and release contained herein, the Church of Scientology of California does hereby release, acquit and forever discharge for itself, successors and assigns, NANCY DINCALCI, her agents, representatives, heirs, successors, assigns, legal counsel and estate and each of them, of and from any and all claims, causes of action, demands, damages and actions of every kind and nature, known or unknown, for or because of any act or omission allegedly done by NANCY DINCALCI from the beginning of time to and including the date hereof.

6. Further, the undersigned hereby agrees to the

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following:

A. That liability for any claims is expressly denied by each party herein released, and this Agreement shall never be treated as an admission of liability or responsibility at any time for any purpose.

B. Each party agrees to assume responsibility for the payment of any attorneys' fees, lien or liens, imposed against him in the past, present, or future, known or unknown, by any person, firm, corporation or governmental entity or agency as a result of, or growing out of any of the matters referred to in this release.

C. DINCALCI has been fully advised and understands that any alleged injuries sustained by her are of such character that the full extent and type of injuries may not be known at the date hereof, and it is further understood that said alleged injuries, whether known or unknown at the date hereof, might possibly become progressively worse and that as a result, damages may be sustained by DINCALCI; nevertheless, DINCALCI desires by this document to forever and fully release the releasees. DINCALCI understands that by the execution of this release no claims arising out of her experience with, or actions by, the releasees, from the beginning of time to and including the date hereof, which may now exist or which may exist in the future may ever be asserted by her or on her behalf, against the releasees.

D. DINCALCI agrees never to create or publish or attempt to publish, and/or assist another to create for publication by means of magazine, article, book or other similar form, any writing, or to broadcast, or to assist another to create, write, film or video tape or audio tape, any show, program or movie, concerning her experiences with the Church of Scientology, or personal or indirectly acquired knowledge or information concerning the Church of Scientology, L. Ron Hubbard, or any entities and individuals listed in Paragraph 2 above. DINCALCI further agrees that she will maintain strict confidentiality and silence with respect to her experiences with the Church of Scientology and any knowledge or information she may have concerning the Church of Scientology, L. Ron Hubbard, or any of the organizations, individuals and entities listed in Paragraph 2 above. DINCALCI expressly understands that the non-disclosure provisions of this subparagraph shall apply, inter alia, but not be limited to, the contents or substance of any documents as defined in Appendix "A" to this Agreement, including but not limited to any tapes, films, photographs, recastings, variations or copies of any such materials which concern or relate to the religion of Scientology, L. Ron Hubbard, or any of the organizations, individuals, or entities listed in Paragraph 2 above. DINCALCI agrees that if the terms of this paragraph are breached by her, that the aggrieved party listed herein above would be entitled to liquidated damages in the amount of $50,000 for each such breach. The reasonableness of the amount of such damages are hereto acknowledged by DINCALCI.

E. DINCALCI agrees to return to the Church of Scientology of California at the time of the consummation of this Agreement, all materials in her possession, custody or control of any nature, including documents as defined in Appendix "A" to this

Agreement, including but not limited to any tapes, films, photographs, recastings, variations or copies of any such materials which concern or relate to the religion of Scientology or any of the persons or entities listed in Paragraph 2 above, all evidence of any nature acquired for the purposes of any lawsuit or acquired for any other purpose concerning any Church of Scientology, any financial or administrative materials relating personally to L. Ron Hubbard, his family, or his estate.

F. DINCALCI agrees that she will never again seek or obtain spiritual counseling or training or any other service from any Church of Scientology, Scientologist, Dianetics or Scientology auditor, Scientology minister, Mission of Scientology, Scientology organization or affiliated organization.

G. DINCALCI agrees that she will not voluntarily assist or cooperate with any person adverse to Scientology in any proceeding against any of the Scientology organizations, individuals, or entities listed in Paragraph 2 above. DINCALCI also agrees that she will not cooperate in any manner with any organizations aligned against Scientology.

H. DINCALCI agrees not to testify or otherwise participate in any other judicial, administrative or legislative proceeding adverse to Scientology or any of the Scientology Churches, individuals or entities listed in Paragraph 2 above unless compelled to do so by lawful subpoena or other lawful process. Unless required to do so by such subpoena, DINCALCI agrees not to discuss this litigation with anyone other than members of her immediate family. DINCALCI shall not make herself amenable to service of any such subpoena in a manner which invalidates the intent of this provision. As provided hereinafter in Paragraph 21, the contents of this Agreement may not be disclosed.

I. DINCALCI hereby acknowledges and affirms that she is not under the influence of any drug, narcotic, alcohol or other mind-influencing substance, condition or ailment such that her ability to fully understand the meaning of this Agreement and the significance thereof is adversely affected.

7. This Release Agreement contains the entire Agreement between the parties hereto, and the terms of this Release are contractual and not a mere recital. This Release may be amended only by a written instrument executed by the undersigned. The parties hereto have carefully read and understand the contents of this Release Agreement and sign the same of their own free will, and it is the intention of the parties to be legally bound hereby. No other prior or contemporaneous agreements, oral or written, respecting such matters, which are not specifically incorporated herein shall be deemed to in any way exist or bind any of the parties hereto.

8. DINCALCI agrees that she will not assist or advise anyone, including partnerships, associations or corporations, contemplating any claim or engaged in litigation or involved in or contemplating any activity adverse to the interests of any entity or class of persons listed above in Paragraph 2 of this Agreement.

9. Each party shall bear its respective costs with respect to the negotiation and drafting of this Agreement and all acts

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required by the terms hereof to be undertaken and performed by any party.

10. The parties to this Agreement acknowledge that all parties enter into this Agreement freely, voluntarily, knowingly and willingly, without any threats, intimidation or pressure of any kind whatsoever and voluntarily execute this Agreement of their own free will.

11. To the extent that this Agreement inures to the benefit of persons or entities not signatories hereto, this Agreement is hereby declared to be made for their respective benefits and uses.

12. The parties shall execute and deliver all documents and perform all further acts that may be reasonably necessary to effectuate the provisions of this Agreement.

13. This Agreement shall not be construed against the party preparing it, but shall be construed as if both parties prepared this Agreement. This Agreement shall be construed and enforced in accordance with the laws of the State of California.

14. In the event any provision hereof is unenforceable, such provision shall not affect the enforceability of any other provision hereof.

15. Each party warrants that it has received independent legal advice from its attorneys with respect to the advisability of making the settlement provided for herein and in executing this Agreement.

16. The parties to this Agreement acknowledge that all parties have conducted sufficient deliberation and investigation, either personally or through other sources of

their own choosing, and have obtained advice of counsel regarding the terms and conditions set forth herein, so that they may intelligently exercise their own judgment in deciding whether or not to execute this Agreement.

17. The parties hereto (including any officer, agent, employee, representative or attorney of or for any party) acknowledge that they have not made any statement, representation or promise to the other party regarding any fact material to this Agreement except as expressly set forth herein. Furthermore, except as expressly stated in this Agreement, the parties in executing this Agreement do not rely upon any statement, representation or promise by the other party or of any officer, agent, employee, representative or attorney for the other party.

18. The parties to this Agreement agree that all parties have carefully read this Agreement and understand the contents thereof and that each reference in this Agreement to any party includes successors, assigns, principals, agents and employees thereof.

19. All references to the plural shall include the singular and all references to the singular shall include the plural. All references to gender shall include both the masculine and feminine.

20. Each party warrants that the persons signing this Agreement have the full right and authority to enter into this Agreement on behalf of the parties for whom they are signing.

21. The parties hereto and their respective attorneys each agree not to disclose the contents of this executed Agreement.

22. This Agreement may be executed in two or more counterparts, each of which shall be deemed to be a duplicate original, but all of which, together, shall constitute one and the same instrument.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement, on the date opposite their names.

Dated: Dec 5, 1986

Nancy Dincalci
NANCY DINCALCI

APPROVED AS TO FORM AND
CONTENT

MICHAEL J. FLYNN
Attorney for
NANCY DINCALCI

Dated: 12/5/86

CHURCH OF SCIENTOLOGY OF
CALIFORNIA

By: Kathleen Moran

7741

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Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
INTERNATIONAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

CASE NO. 157 680

[CONSOLIDATED]

DECLARATION OF KENNETH D. LONG IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION OF THE FOURTH, SIXTH AND ELEVENTH CAUSES OF ACTION OF PLAINTIFF'S SECOND AMENDED COMPLAINT

DATE: January 27, 1995
TIME: 9:00 a.m.
DEPT: 1

TRIAL DATE: May 18, 1995

I, KENNETH D. LONG, hereby state:

1. I am a staff member in the Legal Bureau of the Church of Scientology International, in which I perform the functions of a paralegal. From 1980 through June, 1992, I was a staff member of the Church of Scientology of California and worked as a paralegal in the Legal Bureau of that Church.

2. Since August 1982, I have worked in a paralegal capacity on legal matters relating to Gerald Armstrong. Through the course of this work, I have studied the documents pertaining to legal matters involving Gerald Armstrong, have assisted counsel in the taking of depositions of Gerald Armstrong, and have worked on cases and trials either directly involving Gerald Armstrong or in which Armstrong testified. I am familiar with the proceedings in the case of Church of Scientology vs. Gerald Armstrong, L.A.S.C. Case No. C420153. I am also familiar with the press and media attention which Armstrong obtained prior to the settlement. Further, I am familiar with the releases signed by Vicki and Richard Aznaran. It is based on the above knowledge and experience that I make this declaration and if called upon to do so, I could and would competently testify thereto.

3. At the time that the Aznarans signed release agreements, they were employees of a Church-related entity, and had decided to leave that employment. They had not publicly attacked any Church of Scientology, had not testified on behalf of any anti-Church litigant, and were not themselves anti-Church litigants at the time that they signed the releases.

4. At the time the Church settled with Armstrong, Armstrong was both an anti-Church litigant and a professional witness against the Church in other litigation. He was also a paralegal who worked extensively on anti-Church cases, and a self-designated public relations man who gave interviews to many reporters for sensationalist journals.

5. Prior to December 1986, Armstrong had testified in 15 cases, including his own, for a total of 28 trial days, attacking the Church of Scientology and related entities and individuals.

6. Prior to December, 1986, Armstrong had been deposed for 19 days, and had executed 28 declarations in 15 cases, attacking the Church of Scientology and related entities and individuals.

7. Before December, 1986 Armstrong appeared on more than 10 television and radio programs, attacking the Church of Scientology and related entities and individuals. In October, 1986, Armstrong was interviewed at length on the television program 2020.

8. Before December, 1986, more than 76 stories about Armstrong appeared in United States newspapers. In these articles, too, Armstrong attacked the Church and related entities and individuals.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 19th day of January, 1995, at Los Angeles, California.

Kenneth D. Long
KENNETH D. LONG

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On January 20, 1995, I served the foregoing document described as DECLARATION OF KENNETH D. LONG IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION OF THE FOURTH, SIXTH AND ELEVENTH CAUSES OF ACTION OF PLAINTIFF'S SECOND AMENDED COMPLAINT on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
HUB Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

MICHAEL WALTON
700 Larkspur Landing Circle
Suite 120
Larkspur, CA 94939

[x] BY MAIL

[ ] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[x] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal

cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on January 20, 1995 at Los Angeles, California.

[ ] **(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on ___________ at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[ ] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

______________________	______________________
Print or Type Name	Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)

in may
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Armstrong
PFL/DEFT EXHIBIT 3
WIT: Tarvey
PENNY L. GILMORE, Reporter
7-12-94

REVISED BYLAWS
OF
CHURCH OF SCIENTOLOGY INTERNATIONAL

(A Nonprofit Religious Corporation formed and operated pursuant to the laws of the State of California)

PREAMBLE

The CHURCH OF SCIENTOLOGY INTERNATIONAL (hereinafter referred to as "the corporation"), an association of persons having incorporated exclusively for religious purposes under the laws of the State of California as the same relate to Nonprofit Religious Corporations, does by these Bylaws prescribe the manner in which and the officers and agents by whom such purposes shall be accomplished.

ARTICLE I

The Church

The corporation shall accomplish its purposes through and by means of the operations and activities of a church known as the "Church of Scientology International" and hereinafter referred to as "the Church".

The Church is the ecclesiastical "Mother Church" of the many churches within and without the United States which have been and will be organized for the purposes of the religion of Scientology, all bound together as elements of one international and hierarchical church by voluntary and self determined agreement upon and adherence to the following:

1. The goals, tenets, doctrines, codes, Creed, policies and practices set forth in the Scriptures (as hereinafter defined); and

2. Recognition of the ecclesiastical authority of the hierarchy of the Mother Church; and

3. Governance in ecclesiastical matters by said hierarchy.

The Trustees, Directors, Officers and agents of the corporation shall be bound by and shall observe the foregoing to the end that the operations and activities of this corporation shall support and maintain the Church as a church of Scientology in good standing in accordance with the Scriptures; subject, however, at all times and in every respect to the paramount requirement of observance of and compliance with all applicable laws, and the provisions of the Articles and of these Bylaws.

ARTICLE II

Definition of Terms

As they are used in these Bylaws:

a. "Articles" shall mean the Articles of Incorporation of this corporation filed on November 19, 1981, as may be amended from time to time.

b. "Bylaws" shall mean the code of rules prescribed herein, which are subordinate in authority to the corporation's Articles and which are to be used, adopted and recognized for the regulation and management of the affairs of the corporation;

c. "Religion of Scientology" and "Scientology" shall mean the religious doctrines, beliefs, tenets, practices, applied religious philosophy and technology for its application as developed by L. Ron Hubbard and as the same may hereafter be developed by L. Ron Hubbard.

d. "Scriptures" shall mean the writings and recorded spoken words of L. Ron Hubbard with respect to Scientology and organizations formed for the purposes thereof.

e. "Notice" shall mean written notice actually received by the prescribed recipient not less than three (3) days prior to the event of which notice is given, written notice actually delivered to the prescribed recipient not less than three (3) days prior to the event of which notice is given, or written notice mailed to the prescribed recipient of the notice, by first class mail, not less than five (5) days prior to the event of which notice is given.

f. "Mailed" shall mean deposited in the United States mail, postage prepaid, addressed according to the records of the corporation.

g. Unless the context in which they are used clearly requires otherwise, terms denoting number shall include both the singular and the plural, and terms denoting gender shall include all of the masculine, the feminine, and the neuter.

ARTICLE III

Purposes

Section 1. A Church of Scientology. The corporation shall espouse, present, propagate, practice, ensure and maintain the purity and integrity of, the religion of Scientology, as the same has been developed and may be further developed by L. Ron Hubbard to the end that any person desiring participation, or participating, in Scientology may derive the greatest possible good of increased awareness as an immortal spirit.

It is the belief of the Church that Scientology is the organization of the fundamentals of existence into axioms and workable technologies in the tradition of the exact sciences for resolving problems of life and thought and for the freedom of the human spirit. That he who asks a question is closest to the answer, that every question contains its own answer, and further that every problem contains its own solution, and that the technologies of Scientology are of such a nature that a person with a question or a problem may be spiritually assisted or guided to the end that the person is able to answer his own questions and resolve his own problems. Scientology Technology is a body of truths and methods of application, developed by L. Ron Hubbard from his observations and research, which when correctly applied can reveal the soul of man, extend his knowledge of the Infinite Being to him, and make known what is knowable about God.

Believing that man's best evidence of God is the God he finds within himself, and trusting with enduring faith that the Author of the Universe intended life to thrive within it, the corporation is founded with the following general goals:

a. Establishment of a religious body and entity to promote, protect, administer and encourage the religion of Scientology and its goals;

b. Foundation, construction and use of a church, establishments, tutorial schools, parsonages, centers of training and other centers, for the teaching, dissemination and administration of the religion of Scientology, which aspires to the religious and ethical guidance and improvement of the individual character, and also to better and clarify the human spirit;

c. Publication and distribution of religious literature and other sectarian aids in order to propagate and disseminate Scientology; and

d. Establishment of religious cultural centers.

e. Minister to the spiritual needs of its staff and the clergy of Scientology Churches and Missions throughout the World through the conduct of religious services, both group and individual, and the provision of religious instruction to such persons and to Scientologists throughout the World.

Section 2. Mother Church. In addition to the foregoing, the Church, as the Mother Church, shall oversee and manage the ecclesiastical affairs of all other churches of Scientology to ensure and maintain the purity and integrity of the religion of Scientology. Further, the Church shall be responsible for the overall propagation of the religion of Scientology throughout the World and for the enforcement of the ecclesiastical tenets of the religion as set forth in the Scriptures. In managing the ecclesiastical affairs of all churches of Scientology, the Church shall have as its purpose the responsibility of keeping Scientology working (that is, getting the correct technology applied correctly).

ARTICLE IV

Creed

The Church subscribes, and its object is and purposes are that all of Mankind may subscribe to and practice the following Creed:

WE OF THE CHURCH BELIEVE:

That all men of whatever race, color or creed were created with equal rights.

That all men have inalienable rights to their own religious practices and their performance.

That all men have inalienable rights to their own lives.

That all men have inalienable rights to their sanity.

That all men have inalienable rights to their own defense.

That all men have inalienable rights to conceive, choose, assist and support their own organizations, churches and governments.

That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others.

That all men have inalienable rights to the creation of their own kind.

That the souls of men have the rights of men.

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in nonreligious fields.

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

AND WE OF THE CHURCH BELIEVE:

That man is basically good.

That he is seeking to survive.

That his survival depends upon himself and upon his fellows, and his attainment of brotherhood with the Universe.

AND WE OF THE CHURCH BELIEVE THAT THE LAWS OF GOD FORBID MAN:

To destroy his own kind

To destroy the sanity of another

To destroy or enslave another's soul

To destroy or reduce the survival of one's companions or one's group.

AND WE OF THE CHURCH BELIEVE:

That the spirit can be saved and

That the spirit alone may save or heal the body.

ARTICLE V

Membership

Section 1. Classification. The corporation shall have no members. It shall instead have parishioners who shall not be entitled to vote.

Section 2. Purpose of Affiliation. The Church believes that a person participating in the spiritual exercises of the Church may profit to such an extent that the person may become aware of his spiritual nature, capable of self determination, self discipline and a realization of his creative abilities; thus ordinary problems of life should be easily resolved or be of little or no concern. Therefore, such a person would be better able to contribute to the welfare of his fellow man, Society and the Nation. Such a state of Beingness of Mankind is the goal of the Church.

The Church further believes that man's attainment of advanced levels of spiritual awareness frees the spirit from the mind and body giving the spirit immortality. This in turn will increase life and livingness while diminishing the influence of death or deathlike factors which act as stops and distractions to life.

During the term of affiliation with the Church, the parishioner shall agree to abide by the Creed, the Auditor's Code and the Scientology Code of Honor.

ARTICLE VI

Trustees

Section 1. Purpose. The sole purpose of the Board of Trustees shall be to elect Directors of the corporation. In furtherance of this purpose the Trustees may remove a Director who fails to meet the qualification of a Director or who conducts himself in a manner which is contrary to the provisions of Articles I through IV of these Bylaws and the survival of Scientology. In addition, the Trustees shall have the power to change the number of Trustees, as provided in Section 2 below.

Section 2. Number of Trustees. The authorized number of Trustees shall be five (5) until changed by a bylaw amending this Section 2 duly adopted by the unanimous vote of the Trustees; provided however that the Trustees shall not have the power to reduce the number of Trustees below five (5) or increase the number above seven (7).

Section 3. Qualifications. In order to serve as Trustees of the corporation whether as initial Trustees or successor Trustees, and in order to continue to serve as a Trustee of the corporation, Trustees shall be persons who possess and continue to possess, the following qualities and attributes. That is to say, a person may serve and continue to serve, as Trustee of the corporation only so long as he is and remains:

a. Well-versed in the Scriptures;

b. Well-versed in the Scientology Ethics and Justice System;

c. A proven Scientology executive, as evidenced by statistics;

d. A duly ordained minister of Scientology in good standing pursuant to those principles set forth in the Scriptures; and

e. Has attained the age of majority.

Section 4. Election. The initial Trustees of the corporation shall be elected at the meeting next following the meeting of the Board of Directors adopting these Bylaws. The Trustees shall have lifetime tenure, subject, however, to termination as provided in Section 7.

Section 5. Vacancies. A vacancy in the Board of Trustees shall be deemed to exist in case of the death, resignation or termination of any Trustee as provided in Section 7.

a. Vacancies in the Board of Trustees may be filled by a majority of the remaining Trustees, though less than a quorum, or by a sole remaining Trustee.

b. In the event the Board of Trustees is unable to fill vacancies because of the death or disqualification of the entire Board of Trustees or sole remaining Trustee, then that person holding the senior ecclesiastical post in this Church shall (and only in this unlikely event and only as a singular circumstance) appoint individuals to fill all vacancies on the Board of Trustees, who must themselves meet the qualifications of a Trustee as provided in Section 3.

Section 6. Voting and Other Rights. Each Trustee shall be entitled to one vote. Each Trustee shall have access at all times to the books and records of the corporation.

Section 7. Termination as Trustee.

a. A person's post as Trustee shall terminate at his death or upon receipt by at least one other Trustee of a written notice of his resignation.

b. Pursuant to the Scientology ethics and justice system, a person's post as Trustee may be terminated for actions deemed contrary to the provisions of Articles I through IV of these Bylaws, by the unanimous vote of the other Trustees.

c. A person's post as Trustee shall automatically terminate if he or she at any time fails to meet the qualifications for Trustee which are stated in paragraphs (a), (b), (c) and (d) of Section 3 of this Article.

Section 8. Meetings of Trustees.

a. Annual Meeting. A meeting of the Trustees shall be held on the first day of June of each year at 8:00 p.m. at the principal office of the corporation. No notice of the annual meeting need be given if it is held at such time and at such place. The time and place of the annual meeting may be changed by vote or written consent of a majority of the Trustees, and notice of any such change shall be given to each Trustee. If proper notice is given of any such change in the time or place of the annual meeting, notice need not be given of subsequent annual meetings held at the same time and place.

b. Agenda at Annual Meeting. At the annual meeting of Trustees, consideration shall be given only to the following matters:

i. Election or removal of Directors.

ii. Election or removal of Trustees.

c. Call of Meetings. A special meeting of the Trustees may be called by any Trustee.

d. Notice of Meetings. When required, notice of a meeting of the Trustees shall be given to each Trustee in writing. A notice of meeting need not specify the purpose of the meeting.

e. Waiver of Notice. The transactions at any meeting of the Trustees, however called, however noticed, and wherever held, are as valid as though taken at a meeting duly held after regular call and notice if a quorum is present, and if, either before or after the meeting, each of the Trustees who were absent signs a written waiver of notice and consent to the holding of such meeting. A Trustee shall be deemed to have waived notice and consented to the holding of a meeting, if he votes to approve the minutes of that meeting. All written waivers and consents shall be filed with the minutes of meetings of the Trustees. Notice of a meeting shall also be deemed given to any Trustee who attends a meeting without protesting, before or at its commencement, the lack of proper notice to him.

f. Quorum. A quorum for any meeting of the Trustees shall be a majority of the total number of the Trustees.

g. Minutes. The Trustees shall cause minutes of their meetings to be kept and to be maintained with other records of the Trustees in a secure place.

h. Adjournment. A majority of the Trustees present, whether or not a quorum is present, may adjourn any meeting of the Trustees to another time and place. Notice of the time and place of holding an adjourned meeting need not be given to absent Trustees if the time and place is fixed at the meeting adjourned.

i. Use of Conference Telephones. The Trustees may meet through the use of conference telephone facilities or similar communications equipment, so long as all Trustees participating in the meeting can hear and address one another.

j. Action without Meeting. Any action required or permitted to be taken by the Trustees may be taken without a meeting if all Trustees consent in writing to that action. Such action by written consent shall have the same force and effect as a unanimous vote of the Trustees. Such written consent or consents shall be filed with the minutes of proceedings of the Trustees.

ARTICLE VII

Board of Directors

Section 1. Function and Authority of the Board.

a. Generally. The activities and affairs of the corporation, as distinguished from the ecclesiastical affairs of the Church, shall be managed and coducted, and all corporate powers shall be exercised, by or under the direction of a Board of Directors, consisting of five (5) natural persons. The authorized number of directors may be changed by a bylaw- amending this Section 1(a) duly adopted by the unanimous vote of the Directors; provided however that the Directors shall not have the power to reduce the number of Directors below three (3) or 'increase the number above five (5). The Directors in general shall have all applicable powers conferred, permitted, or authorized by law as directors of a nonprofit religious corportion, including the power to purchase, lease, encumber by mortgage or deed of trust, sell, pledge and convey property of the corporation, and to borrow funds for the use and benefit of the corporation. Each Director shall have access at all times to the books and records of the corporation.

b. Particular Functions. More particularly, and without limiting its power and authority in general, the Board of Directors may, in its sole discretion:

i. Borrow money and incur indebtedness on behalf of the corporation, and cause to be executed and delivered therefor, in the corporate name, promissory notes, bonds, debentures, deeds of trusts, mortgages, pledges, hypothecations, or other evidences of debt and securities therefor;

ii. Make and perform such contracts as are necessary or convenient to attain or further the purposes and objects of the corporation, as set forth in the Articles and in these Bylaws;

iii. Delegate to the corporation's officers, or to other agents, regular and special duties of the Board of Directors, the delegation of which is permitted by law and consistent with the Articles;

iv. Publish and disseminate books, periodicals, pamphlets, tracts, sermons, films, tapes and pictures in furtherance of the purposes of the corporation; and

v. Change the principal office of the corporation from one location to another, and establish and locate subsidiary offices of the corporation.

c. Special Duty of the Board. It shall be a special duty of the Board of Directors to assure:

i. That no part of the net earnings of the corporation inure to the benefit of any person;

ii. That no substantial part of the activities of the corporation are directed to influencing legislation by propaganda or otherwise;

iii. That the corporation and its agents refrain from participation or intervention in any political campaign on behalf of or in opposition to any candidate for public office;

iv. That the property, assets and net income of the corporation remain irrevocably dedicated to charitable and religious purposes; and

v. That, upon the dissolution or winding up of the corporation, its assets remaining after payment of or provisions for payment of all debts and liabilities of the corporation are distributed to a nonprofit fund, foundation, or corporation which is organized and operated primarily and exclusively for charitable and religious purposes, and which is exempt from general income taxation as an organization described in Section 501(c)(3) of the Internal Revenue Code of 1954, as amended.

Section 2: Election and Tenure of Directors.

a. Election. Directors shall be elected by majority vote of the Trustees of the corporation. The Trustees shall elect one of the Directors as Chairman of the Board. Trustees may not cumulate votes in electing Directors. Regular elections of Directors shall be held at the annual meeting of the Trustees. Special elections may be held as necessary to fill vacancies on the Board of Directors. Directors may not be elected from among the Trustees. Directors shall hold office for one year or until the next annual meeting of the Trustees, whichever period is shorter. Directors may be re-elected.

b. Compensation. Directors shall receive no compensation for their service as Directors, but shall be entitled to reimbursement for expenses incurred on behalf of the corporation, whether or not such expenses are incurred in their capacities as Directors.

c. Qualifications. In order to serve as a Director and in order to continue to serve as a Director, each Director shall be a person who possesses and continues to possess the following qualities and attributes. That is to say, a person may serve and continue to serve as a Director only so long as he is and remains:

i. **Well-versed in the Scriptures;**

ii. Well-versed in the Scientology Ethics and Justice system;

iii. A proven Scientology executive, or a proven auditor, or case supervisor, as evidenced by statistics;

iv. A duly ordained minister of Scientology in good standing pursuant to the principles set forth in the Scriptures; and

v. Has attained the age of majority.

d. Removal. Upon an affirmative vote of a majority of the Trustees, a director may be removed, on the following grounds:

i. Failure to continue to meet the qualifications set forth in subparagraphs (i) through (iv) of subsection (c) above;

ii. Failure to exercise the duties of a Director in pursuance of the goals, aims and purposes of the corporation, the Church and Scientology, as set forth in Articles I through IV of these Bylaws.

Section 3. Meetings of Directors.

a. Call of Special Meetings. Special meetings of the Board of Directors may be called by the Chairman, or by any two Directors, or by the President.

b. Notice. Notice of all special meetings of the Board of Directors, or of an annual meeting to be held at a time or place other than a time or place fixed by resolution of the Board of Directors, shall be given to each Director.

c. Waiver of Notice. Transactions of any meeting of the Board, however called, however noticed, and wherever held, are as valid as though adopted at a meeting duly held after regular call and notice if a quorum is present and if, either before or after the meeting, each of the Directors not present signs a written waiver of notice and consent to the holding of such meeting. A Director shall be deemed to have waived notice and consented to the holding of a meeting if he votes to approve the minutes thereof. All such waivers or consents shall be filed with the minutes of meetings of the Board of Directors. Notice of a meeting shall also be deemed given to any Director who attends a meeting without protesting, before or at its commencement, the lack of proper notice to him.

d. Quorum. A majority of the Directors authorized shall constitute a quorum of the Board of Directors for transaction of business or for taking of action which may be taken with less than unanimous consent of all Directors.

e. Minutes. The Directors shall designate one of their number or an officer of the corporation to keep minutes of their meetings.

f. Adjournment. A majority of the Directors present, whether or not a quorum is present, may adjourn any Directors' meeting to another time and place. Notice of the time and place of holding an adjourned meeting need not be given to absent Directors if the time and place be fixed at the meeting adjourned.

g. Regular, Annual and Special Meetings. Meetings of the Board of Directors shall be held no less often than annually. Meetings designated as annual meetings shall be held in the month of June of each year. Meetings other than annual meetings shall be called regular meetings or special meetings. The time and place of annual meetings may be fixed by unanimous resolution of the Board of Directors, and, once so fixed, shall not be subject to the notice requirements of subsection (b).

h. Use of Conference Telephones. Directors may meet through the use of conference telephone facilities or similar communications equipment, so long as all Directors participating in the meeting can hear and address one another.

i. Action without a Meeting. Any action required or permitted to be taken by the Board of Directors may be taken without a meeting if all Directors consent in writing to that action. Such action by written consent shall have the same force and effect as a unanimous vote of the full Board. Such written consent or consents shall be filed with the minutes of the meetings of the Board of Directors.

ARTICLE VIII

Officers of the Corporation

Section 1. Required Officers. Officers of the corporation, as distinguished from ecclesiastical posts, shall be elected by majority vote of the Board of Directors, and shall include a President, a Secretary, and a Treasurer, each of whom shall serve at the pleasure of the Board. Each of said offices may be held by a person who is also a Director. The Board of Directors may elect the same person to the offices of Secretary and Treasurer.

Section 2. Optional Officers. The Board of Directors may elect one or more Vice-Presidents, and one or more Assistant Secretaries and Assistant Treasurers and such other subordinate officers as the Board of Directors shall from time to time deem appropriate.

Section 3. Duties of Officers.

a. The President shall have general supervisory responsibility for the business affairs of the corporation. In addition, he shall perform all other acts and duties which the Board of Directors shall direct. The President shall be the Chief Executive Officer of the corporation, to whom other officers and their agents shall report and be responsible for the proper performance of their duties.

b. The Vice-President, if any, shall carry out such duties on behalf of the corporation as may be assigned to him by the Board of Directors or by the President. In the absence or disability of the President, the duties of the President shall be discharged by the Vice-President.

c. The Treasurer shall be the Chief Financial Officer of the corporation and shall have custody of its corporate funds, books and financial records. The Treasurer shall have authority to receive and accept money, collect debts, open bank accounts, and make disbursements in the name of the corporation. The Treasurer shall keep or cause to be kept proper books of account reflecting all business done by the corporation and of all monies received and disbursed, and shall prepare or cause to be prepared financial statements at the request of the Board of Directors. The Treasurer shall deposit all money and other valuables in the name and to the credit of the corporation, with such depositories as may be designated by the Board of Directors. The Treasurer shall disburse funds of the corporation at the direction of the Board. The Treasurer shall, whenever requested to do so by the President or Board of Directors, account for all transactions engaged in or authorized by him as Treasurer.

d. The Assistant Treasurer, if any, shall carry out such duties on behalf of the corporation as may be assigned or delegated to him by the Board of Directors, by the President, or by the Treasurer. In the absence or disability of the Treasurer, the Assistant Treasurer shall discharge the duties of the Treasurer.

e. The Secretary shall keep or cause to be kept a book of minutes of all meetings of the Trustees and of the Board of Directors, and of the meetings of any committee for which the Board requires that minutes be kept. The Secretary shall keep or cause to be kept, at the principal office of the corporation, a copy of these Bylaws. The Secretary shall keep the seal of the corporation and shall attest all certificates or other legal documents requiring certification on behalf of the corporation.

f. The Assistant Secretary, if any, shall carry out such duties on behalf of the corporation as may be assigned or delegated to him by the Board of Directors, by the President, or by the Secretary. In the absence or disability of the Secretary, the Assistant Secretary shall discharge the duties of the Secretary.

Section 4. Execution of Contracts. Contracts, instruments of conveyance or encumbrance, or other obligations of the corporation may be executed and delivered on behalf of the corporation by any two (2) officers of the corporation unless the Board of Directors provides otherwise by general or special resolution.

ARTICLE IX

Liability of Directors and Officers

Directors, Officers, Trustees and other agents of the corporation, and the property of such persons, shall not be subject to or chargeable with payment of corporation debts or obligations.

ARTICLE X

Ordination of Ministers and Religious Orders

Section 1. Ordination. The Church shall have full power and authority to ordain ministers, who shall be empowered to perform marriage ceremonies, administer the confessional, bury the dead, baptize, practice spiritual healing, give spiritual healing, give spiritual advice, and minister to the spiritual needs of clergy, congregations and parishioners; to revoke such status of ordained minister; and to grant and revoke such other degrees and certificates of attainment or qualification as may be appropriate.

Section 2. Code of Conduct. This Church shall ask and require from its ordained ministers conformity with the following minister's code (known as the Scientology Auditor's Code), relating to the spiritual ministration to, and guidance of, all parishioners and/or confessants:

I HEREBY PROMISE AS AN AUDITOR TO FOLLOW THE AUDITOR'S CODE.

1. I promise not to evaluate for the preclear or tell him what he should think about his case in session.

2. I promise not to invalidate the preclear's case or gains in or out of session.

3. I promise to administer only Standard Tech to a preclear in the standard way.

4. I promise to keep all auditing appointments once made.

5. I promise not to process a preclear who has not had sufficient rest and who is physically tired.

6. I promise not to process a preclear who is improperly fed or hungry.

7. I promise not to permit a frequent change of auditors.

8. I promise not to sympathize with a preclear but to be effective.

9. I promise not to let the preclear end session on his own determinism but to finish off those cycles I have begun.

10. I promise never to walk off from a preclear in session.

11. I promise never to get angry with a preclear in session.

12. I promise to run every major case action to a floating needle.

13. I promise never to run any one action beyond its floating needle.

14. I promise to grant beingness to the preclear in session.

15. I promise not to mix the processes of Scientology with other practices except when the preclear is physically ill and only medical means will serve.

16. I promise to maintain Communication with the preclear and not to cut his comm or permit him to overrun in session.

17. I promise not to enter comments, expressions or enturbulence into a session that distract a preclear from his case.

18. I promise to continue to give the preclear the process or auditing command when needed in the session.

19. I promise not to let a preclear run a wrongly understood command.

20. I promise not to explain, justify or make excuses in session for any auditor mistakes whether real or imagined.

21. I promise to estimate the current case state of a preclear only by Standard Case Supervision data and not to diverge because of some imagined difference in the case.

22. I promise never to use the secrets of a preclear divulged in session for punishment or personal gain.

23. I promise to never falsify worksheets of sessions.

24. I promise to see that any donation received for processing is refunded following the policies of the Claims Verification Board, if the preclear is dissatisfied and demands it within three months after the processing, the only condition being that he may not again be processed or trained.

25. I promise not to advocate Dianetics or Scientology only to cure illness or only to treat the insane, knowing well they were intended for spiritual gain.

26. I promise to cooperate fully with the authorized organizations of Dianetics and Scientology in safeguarding the ethical use and practice of those subjects.

27. I promise to refuse to permit any being to be physically injured, violently damaged, operated on or killed in the name of "mental treatment".

28. I promise not to permit sexual liberties or violations of patients.

29. I promise to refuse to admit to the ranks of practitioners any being who is insane.

Section 3: Religious Orders. The Church may establish and maintain religious orders, the purposes of which shall be the carrying out of the religious and administrative activities of this Church and corporation. The Church may also establish and maintain religious orders, the purposes of which shall be the supervision of ecclesiastical affairs of other churches of Scientology as set forth in Article III. The specific functions and duties of such religious orders, and of the members of such orders, shall be as determined and assigned by the Board of Directors in accordance with the Scriptures, and consistent with the purposes for religious orders herein stated.

Acceptance of persons into the religious orders of the Church shall be governed by the applicable Scriptures. Persons seeking acceptance into a religious order of this Church shall enter into a covenant expressing the individual's desire and intent to devote himself to accomplish the goals and purposes of this Church and the

Religion of Scientology. All members of the religious order shall agree to abide by the policies of this Corporation, the Scriptures, the Articles, and these Bylaws.

Section 4. Terminations. Membership, affiliation, charters, ordinations, certifications, or other special dispensations, or recognitions, shall terminate, by direction of the Board of Directors, for the following causes:

a. Death,

b. Resignation,

c. Actions deemed contrary to the principles, purposes, aims, code, ecclesiastical letters, policies, covenants, agreements, the Bylaws of this corporation and Scientology.

Section 5. Return of Property. Upon any termination, pursuant to Section 4 of this Article X, then the person who's status has been terminated shall be required immediately to return to the corporation or Church any and all real and personal property issued to such person by this corporation or Church.

Section 6. Discretion of Directors. Pursuant to the Scriptures, particularly the ethics and justice system of Scientology, membership in a Religious Order, ordination, or affiliation may be denied or revoked for cause deemed to be sufficient by the Directors in their sole discretion.

ARTICLE XI

Principal Office

The corporation's principal office shall be located at such place, within or without the State of California, as a majority of the Board of Directors may, in its discretion, determine from time to time.

ARTICLE XII

Seal

The corporation shall have a seal, the form of which shall be determined and adopted by the Board of Directors.

ARTICLE XIII

Amendments

Unless otherwise provided in these Bylaws, these Bylaws may be amended or repealed and new Bylaws adopted by unanimous vote of the Board of Directors; provided that amended Bylaws or new Bylaws do not jeopardize the tax-exempt status of this corporation, do not alter the purposes of this corporation or the qualifications required of its Trustees and Directors, and do not contravene the Scriptures.

CERTIFICATION

I, the undersigned, do hereby certify:

1. That I am the duly elected and acting Assistant Secretary of the Church of Scientology International, a nonprofit religious corporation incorporated under the laws of the State of California; and

2. That the foregoing Bylaws constitute the Revised Bylaws of said corporation, as duly adopted by animous written consent of the Directors and Voting Members of the corporation, dated as of the 20th day of May, 1982.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the seal of the said corporation, this 21st day of May, 1982.

Sandra Brennan

Assistant Secretary

CERTIFICATE

I, Lynn R. Farny, hereby certify as follows:

1. That I am the duly elected and acting Secretary of Church of Scientology International, a nonprofit religious corporation incorporated under the laws of the State of California;

2. That the following amendement to Article VII, Section 2.a of the Bylaws of the corporation was duly adopted by unanimous written consent of the Board of Directors of the corporation on April 3, 1994:

> a. Election. Directors shall be elected by majority vote of the Trustees of the corporation. The Trustees shall elect one of the Directors as Chairman of the Board. Trustees may not cumulate votes in electing Directors. Regular elections of Directors shall be held at the annual meeting of the Trustees. Special elections may be held as necessary to fill vacancies on the Board of Directors. Only one Director may be elected from among the Trustees. Directors shall hold office for one year or until the next annual meeting of the Trustees, whichever period is shorter. Directors may be re-elected.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the seal of said corporation this 15th day of April, 1994.

Lynn R. Farny

Lynn R. Farny, Secretary

ORIGINAL
FILED
SEP 18 1995
HOWARD HANSON
MARIN COUNTY CLERK
by J. Steele, Deputy

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

7778

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 9/29/95
Time: 9:00 a.m.
Dept: One
Trial Date: Not Set

VOLUME VIII

ORIGINAL

7779

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

DECLARATION OF HANA WHITFIELD IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

DECLARATION OF HANA ELTRINGHAM WHITFIELD

I, Hana Eltringham Whitfield, declare:

1. I am over the age of 18 years. I am a resident of the State of California and I have personal knowledge of the matters set forth herein, and if called upon as a witness herein I could testify competently thereto.

2. I was an active member of the Church of Scientology International, hereinafter "CSI," and its predecessor, the Church of Scientology of California, hereinafter "CSC," from March, 1965 to August, 1984.

3. Appended hereto as Exhibit A is a true and correct copy of my declaration executed April 4, 1994 and filed in the case of Church of Scientology International v. Steven Fishman and Uwe Geertz, Case No. CV 91 6426 HLH. This declaration provides accurate information as to my history in Scientology, the positions I held and my responsibilities, the lengthy training I received in the auditing techniques of Scientology founder and leader L. Ron Hubbard, hereinafter "Hubbard," and in his organization and executive management techniques, and some of the extensive knowledge I have of Scientology's policies, bulletins and procedures. It also contains a description of the extreme hardships I experienced while a Scientologist and the insidious "fair game" practices to which my husband, Jerry Whitfield, and I were subjected after we left Scientology and dared to discuss our experiences and opinions. We continue to be targets of fair game to this day.

4. My husband and I now work professionally with families who have a loved one in Scientology. Families hire us to inform and educate their loved ones about the secret and hidden, and the actual, policies and practices of Scientology and their dangers, and of Scientology's ongoing, complex campaign to keep these secrets hidden from the public and from most of its members until they have been completely indoctrinated and are under Scientology's absolute control. Having the information we provide, the loved ones are then more able to make informed choices about their adherence to Scientology and participation in its activities. My husband and I also work with Scientologists who have doubts about their involvement in Scientology and approach us on their own for information. We have been doing this work of informing and educating successfully since 1985.

5. Because of my long tenure in Scientology and holding many executive positions, I have personal knowledge of the fact that people are drawn into Scientology by false representations and then held in it by various manipulative techniques, often to their physical, emotional and mental detriment.

6. As an example, I was drawn into Scientology in early 1965, in Johannesburg, South Africa, through reading Hubbard's book, "Dianetics the Modern Science of Mental Health," by its astonishing claims, some of which were:

A. Those who reach "clear," a state guaranteed by

Hubbard, can be tested for any and all psychoses, neuroses, repressions and compulsions (all aberrations) and can be examined for any autogenetic (self-generated) diseases, also known as psychosomatic ills, and the tests will show the "clear" entirely free of such.

B. Tests of the clear's intelligence will show it to be high above the norm.

C. A clear can remember everything that has ever happened to him and everything he has studied.

D. A clear's health is greatly improved and he will never again experience any psychosomatic illness of any kind. A clear never gets colds.

E. A clear's ethical, moral and professional standards are the highest.

F. A clear thinks and acts completely rationally in any circumstances at any time.

7. After reading "Dianetics" I was convinced that Hubbard had discovered the cure for all mental and physical ills, that attaining clear was the most desired aim in the world and should be sought by the whole human race. So strong were my beliefs, started by my reading of "Dianetics," that I held them unwaveringly for twenty years, despite experiences that, were I in a normal frame of mind, would have caused me to leave the group many years earlier, and despite continually seeing behavior and mental and physical conditions in "clears" and in Hubbard himself, which belied his Dianetics promises.

8. The book, "Dianetics the Modern Science of Mental Health," which is used extensively in the Scientology organization in its initial "auditing" programs and "auditor" training, was considered so important by Hubbard and Scientology's senior management executives, that its public bookstore sales records were manipulated and falsified for years by Scientologists in order to keep it on the U.S. "best seller" lists. "Auditing" is Scientology's psychotherapeutic processing, which it calls, for "religious" purposes, "pastoral counseling."

9. While becoming involved in the Johannesburg Scientology Organization I also heard many stories about Hubbard and read Scientology's biographies about him. These included the stories that he was a much decorated hero of World War II, that he received extensive war wounds including blindness and lameness, yet recovered fully through his own research and techniques, which he had further developed into Dianetics and included in his book. I was deeply impressed with what I heard and read about him.

10. I know hundreds if not thousands of Scientologists across the years who were drawn into Scientology by the same claims as I was.

11. Once in contact with Scientologists, neophytes (what Scientologists cynically call "raw meat") are manipulated and indoctrinated rapidly and more deeply into an array of false and delusionary convictions about Scientology. From personal

experience some of these are:

A. That only Hubbard's procedures in Scientology can break one free of the repetitive, never-ending birth-death pattern, also known as reincarnation, a core belief of Scientology. It is often stated that "Scientology is the only road to total freedom."

B. That only Scientologists have the answers to the Universe and Life itself.

C. That only by strict and unconditional adherence to Scientology's policies and practices, can one regain one's complete abilities and eternal survival as a spiritual being.

D. That the whole human race except for Scientologists is doomed to eternal oblivion.

E. That a Scientologist will only progress in life and reach his spiritual and physical goals by living and associating with other Scientologists, to the point of severing connections to family and/or spouse and children and/or friends if they are disinclined to become Scientologists, are slow in showing interest, or express criticisms or diverging perspectives to those of Scientology.

F. That a Scientologist living on his own in a non-Scientology or "wog" community will be unable to maintain the improvements he achieved in Scientology, but will uncontrollably deteriorate into, the same eternal oblivion destined for "wogs."

G. That people who frequently display emotions of antagonism, anger, fear, sorrow, apathy or even chronic pain, are deemed by Hubbard to be chronically "down tone" or low in emotional tone. Hubbard wrote that such people cannot be reasoned with, that they do not deserve any civil rights of any kind and that one of two ways to deal with them is to dispose of them quietly and without sorrow. From this contemptuous and antisocial attitude the fair game doctrine became acceptable to Scientologists.

H. That all Hubbard's writings, taped lectures, policies, bulletins and techniques are "sacred scriptures" which cannot be changed or canceled except by Hubbard himself - even though he died in 1986.

I. That all Hubbard's writings, taped lectures, policies, bulletins and techniques - the sacred scriptures - are correct as written and any disagreement with them or difficulty with them by anyone reading or studying them is the reader's or student's fault, not Hubbard's.

J. That any criticism of Hubbard, his family, writings, techniques, policies or philosophy is tantamount to a criminal act and shows that the person has undisclosed crimes against Hubbard or Scientology.

K. That if a person's information can be controlled the person can be controlled. Hubbard was a master of control of information within Scientology's ranks.

L. That criminal or socially deviant actions which were carried out by Scientology and later exposed, were "against policy" and done by misguided "individuals" who went astray.

12. The most glaring example of how Scientology deals with its exposed criminality is the following. In 1966 Hubbard formed within Scientology and organization called the Guardian's Office, hereinafter "GO." Its publicly stated purpose was to "safeguard Scientology." Its hidden agenda, based on Hubbard's policies or "scriptures," was to attack, sue, intimidate, harass and threaten into silence anyone who spoke and wrote negatively about Hubbard and his group. The vast majority of Scientologists knew nothing of the acts, including serious crimes, against people, or Hubbard's secret policies which brought them into being. They believed the GO was constructively extending Scientology's influence into society through social programs such as education, drug addiction, conducting charity drives, and other public relations "good works." When eleven top Scientology executives, including Hubbard's wife Mary Sue Hubbard, were convicted and imprisoned in the late 1970s Scientologists the world over, including my husband and me, were told that the trial was unjust in the extreme as all Mary Sue and her GO staff had done was steal xerox paper. We never were told that

the eleven GO staff were imprisoned for obstruction of justice, breaking into Justice Department offices, wire tapping, and impersonating federal officials, among other things. We were also never told about the GO's covert intelligence operations and terror tactics against targeted individuals, how the GO set them up in "crimes,"and had them falsely prosecuted, which surfaced through the 1977 FBI raid on GO headquarters in Los Angeles and Washington, D.C. Scientology staff were forbidden to read newspapers and magazines or to watch TV in the late 1970s and early 1980s at Scientology's central base in Clearwater, Florida, and we were forbidden to speak to journalists; all of which prohibitions kept us uninformed of true events. Then in the early 1980s, due to its tarnished public image, the GO was renamed the "Office of Special Affairs," hereinafter "OSA," and was allegedly "reorganized." Scientologists over the world were told that those responsible for the crimes had been removed and that "we don't do that anymore."

13. The experiences of many former Scientologists during the post-GO, OSA era, however, including those of Gerald Armstrong, hereinafter "Armstrong," and my husband and me, as well as lawyers litigating against Scientology and other viewed "enemies," show that the practices of harassment, intimidation, threats, law suits and more continue unabated. In essence, the practice of fair game goes on as before.

14. In our work, my husband and I use a great deal of

information made public by Armstrong. This includes his declarations in various lawsuits as well as his own lawsuit, Church of Scientology of California v. Gerald Armstrong, Mary Sue Hubbard Intervenor, Los Angeles Superior Court No. C 420153, which resulted in 1984 in the widely known and used "Breckenridge decision." This decision, in Armstrong's favor, condemned fair game and other Scientology practices including the misuse of Scientologists' confessions in supposedly confidential auditing sessions. The Armstrong case also brought to light Armstrong's discoveries of many lies Hubbard told about his past and his credentials, which were used in Scientology's promotion and marketing of its services, as well as fair game actions against perceived enemies.

15. The information about Scientology's secret agenda, fair game practices and Hubbard's misrepresentations which was revealed through the Armstrong trial and case provided many Scientologists access to the truth about Scientology for the first time, and enabled many to break free from Hubbard's and Scientology's manipulation and hold.

16. My husband and I have ourselves been targets of extensive fair game operations and "black propaganda," since 1985. Black propaganda is a term Hubbard used to designate a practice of destroying someone's reputation with lies, often from hidden or unnamed sources. Those operations that my husband and I know of are detailed in my declaration, Exhibit A, at paragraphs 69 to 93 and 128 to 135. In summary, we have

been subjected to:

A. Surveillance by Scientology hired private investigators, hereinafter "PI's," and Scientology staff 24 hours a day for weeks at a time in the United States and Europe.

B. Surveillance by Scientology PIs and staff while talking with families and their loved one.

C. Repeated false accusations on TV, radio and in writing, that we were kidnappers and do forced deprogrammings.

D. Repeated attempts to obtain our long distance phone records.

E. Invasion of our AMEX credit card accounts by impersonating my husband.

F. Harassment of our families in America, Europe and South Africa by Scientology PI's, some of whom represented themselves as federal government officials.

G. Filing false complaints against us with various State authorities. None of these came to anything.

H. Attempting to implicate my husband falsely in a bomb threat against a Scientology front group, Sterling Management Systems, in 1989. (In the late 1970s Scientology was found responsible for the harassment of New York freelance writer Paulette Cooper, including the manufacture of false bomb threats by Cooper.)

I. Harassment of at least fifty of our friends and associates by Scientology PI's in America, Canada, Europe and Australia.

J. Creation of "dead agent" packs of information designed to destroy my husband's and my reputations. Innumerable copies of these, each different from the last, have been mailed to friends and colleagues, and even persons we did not know, and handed out at conventions, conferences and meetings of former Scientologists and/or former cult members. Dead agent packs on myself include three different, and false, charges that I killed my father thirty years ago, that I masterminded his murder by another, and that I attempted the murder myself. The packs contain photographs of a severely battered, bruised and unrecognizable dead man's face. They contain my younger sister's 1946 affidavit which detailed incest she experienced while growing up. They contain memos written in the early 1990s by my former husband Guy Eltringham, an active Scientologist, to OSA, giving them information about me under the headings, "Possible means to reduce her influence or effect," and "Other information which possibly would not be in her ethics or pc ("preclear," auditing, or "pastoral counseling") files."

K. David Miscavige, head of Scientology world wide, falsely told over 700 top Sea Organization staff in the early 1990s that I killed my father and was serving time in a South African prison. (The Sea Org is the top echelon of Scientology management and operations wherein the members sign a contract for a billion years.)

L. False accusations by Scientology attorneys that my husband and I were guilty of theft of Scientology documents.

M. A malicious and completely unsubstantiated lawsuit filed against my husband and me for "false imprisonment." The plaintiff, a Scientologist, who was following us, was stopped and briefly detained by police for suspicious behavior and apparently driving an unlicensed vehicle. Thereafter he filed the lawsuit against us. He dismissed the suit in 1993.

N. Scientologists have repeatedly demonstrating outside our home, carrying signs and handing out leaflets stating that we are kidnappers, that I am a murderer, and my husband a thief, drug dealer and wife beater.

17. While in Scientology and going through extensive training in Hubbard's auditing techniques, I was gradually exposed to and became familiar with Hubbard's writings and his attitudes concerning God, Jesus Christ and Christianity.

18. In 1965, after I arrived at Hubbard's then worldwide Scientology Headquarters at Saint Hill in East Grinstead, England, I was a full time student. Toward the end of 1965 or early 1966, because of a wave of anti-Scientology sentiment in the press, Hubbard gave orders that all Saint Hill "auditors"

were to wear clerical garb and a "Scientology cross," and that from then on "Sunday Services" were to be held in the "Chapel." In fact the "Chapel" was routinely and usually used as a course room. It was the course room in which I studied 10 or more hours daily, and sometimes seven days a week. I was confused when I first heard Hubbard's orders; I had not previously known his public statement that Scientology was a religion. Hubbard further told the Saint Hill staff and students, myself included, that his orders were to create the impression among the government, press and public that Scientology was a proper religion. But it was common knowledge among dedicated Scientologists that Hubbard's orders were designed to deceive non-Scientologists in order to gain acceptance for Scientology.

19. In 1966, while studying the upper levels of the "Saint Hill Special Briefing Course," which covered all of Hubbard's "technical" developments from 1950 to 1966, I studied a bulletin entitled "Routine 3 Heaven," dated May 11, 1963, a true and correct copy of which is appended hereto as Exhibit B. In it, to my increasing astonishment and concern, Hubbard wrote that he did not believe in Christianity, God, Heaven and Christ. He wrote, moreover, that he had just discovered that Heaven did exist as an electronic implant, that it was created by an false belief by an "implant station" 43 trillion years ago, that the implant contained "angels," "plaster saints," signs to "Hell," the "pearly gates,"

"Joseph," the "Madonna and child," "Bethlehem," and various other Biblical symbols. Hubbard wrote that the implant, Heaven, was false and full of lies, and that religion was based on lies. He wrote that the "Creator of Heaven" had entrapped us all and that only Scientology had the way to free us again.

20. Having been brought up in a basically Christian family, and having attended church regularly while growing up, and personally believing in Christ and God, I was shocked to read this and other related bulletins with similar anti-Christian and anti-religion assertions.

21. However, because of Hubbard's claims in the bulletin that the information was discovered through thousands of hours of "scientific research" and not based on opinion, that all Scientology data came from "long, arduous and painstaking research" and is "common to all minds and all men and can be demonstrated on anyone," and that he and Scientology sought "freedom, the betterment of Man," that he had researched and compiled it for "the greatest good for the greatest number," and, importantly, that honest people could accept it, and because of my faith in Hubbard, I consciously chose, without further independent investigation, to accept it as correct over the religious faith of my upbringing. All Scientologists who get past this point do the same.

22. From then on I felt I was one of the initiated, one of the chosen and that I was really on the "Road to Total

Freedom." The "special" nature of Scientology and its unique role in the salvation of mankind was deeply re-emphasized in my mind. From then on I was fully aware of Hubbard's duplicity in molding Scientology's double agenda. Externally Scientology showed itself as religious and sensitive to deep social and humanitarian issues and actively participating in social activities of all kinds. Internally it condemned all religious believers as aberrated and worthless, and, depending on their degree of opposition to Scientology, labelled them merely a nuisance, or suppressive and "fair game."

23. From that point on I regularly read Hubbard's writings or listened to his tape lectures which stated his and Scientology's anti-religious beliefs and practices. In late 1968 or early 1969, on board Hubbard's flagship, the "Royal Scotman," I read a bulletin by Hubbard entitled "Resistive Cases Former Therapy," dated September 23, 1968, a copy of which is appended hereto as Exhibit C, which expanded on his "scientific research" assertion that God and Christ are electronically implanted ideas. He wrote that Christ was part of an implant 75 million years ago, that the Niocene Creed invented Him to "implant their way to power," and that the Christian Church still uses implanting.

24. Miscavige, Scientology's current leader, recently mandated that eligibility for OT 9 and OT 10, the "top" levels on Scientology's auditing pyramid not yet "released" for public consumption, includes completing the "Saint Hill

Special Briefing Course." From personal experience I can verify that the more a Scientologist is exposed to and indoctrinated in Hubbard's fantastic beliefs and ideas, the more ardent, aggressive and criminally inclined the Scientologist becomes, and more like Hubbard.

25. Throughout the years I practiced and applied Hubbard's auditing techniques, in the 1960s, 70s and 80s, I can verify that those Scientologists who held onto religious and spiritual beliefs and values not espoused by Scientology, despite being gradually exposed to teachings such as those in Exhibits B and C hereto, were considered particularly "aberrated." In the early stages of their adherence to Scientology, such persons were quietly tolerated and smugly labeled as "former therapy cases." (Ex. C) Then at some point, and at the direction of their "case supervisor," they were ordered into specific auditing actions designed to systematically desensitize their particular religious beliefs and ideas. They were also frequently ordered to obtain "case cracking auditing" to resolve their "religious aberrations" and to simultaneously study Scientology teachings.

26. This was done not only with Christian-thinking people. During the years of 1968 through the early 1970s when we sailed the northern African and Moroccan coastlines with Hubbard, I heard him say several times that any Arab or Moroccan who wanted to join the ship's crew could do so as long as he or she passed basic security requirements, and

could remain on board indefinitely only if he or she fully converted to Scientology and had received full auditing resolution of his or her former beliefs and practices. Hubbard said that only such full conversion would raise them above suspicion and enable them to stay.

27. I feel very strongly that it is in the public's interest to continue to have complete access to information that Armstrong helped make public, and in which he is an authoritative source. Public individuals and Scientologists have a right to all the information available about Scientology, both good and bad.

28. It is unconscionable that Scientology thinks that it can say whatever it wants about Armstrong's information and knowledge, about his legal cases, and about Armstrong himself, and that Armstrong cannot even respond, much less have the same freedom to say what he knows to be true about himself and Scientology. It is unconscionable that Armstrong's former attorney Michael Flynn, in order to get himself out from under the threat of fair game, permitted such an agreement to be presented to Armstrong and his other clients to "settle" their cases. It is also unconscionable that any court in this or any country could consider, much less order, the enforcement of such an "agreement." There are very few who stand up to the evil that Scientology practices. These should be supported by our justice system, not silenced.

I declare under the penalty of perjury under the laws of the California that the foregoing is true and correct.

Executed in Los Angeles, California this 6th day of April, 1995.

Hana Whitfield
Hana Eltringham Whitfield

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MAR 10 1994
CENTRAL DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY INTERNATIONAL,

Plaintiff,

vs.

STEVEN FISHMAN and UWE GEERTZ,

Defendants.

No. CV 91-6426 HLH (Tx)

REVISED DECLARATION OF HANA WHITFIELD RE MOTION FOR COSTS

Date: APRIL 4, 1994
Time: 10:00 a.m.
Courtroom: 7

RECEIVED
MAR 18 1994
HUB LAW OFFICES

DECLARATION OF HANA WHITFIELD

I, Hana Whitfield, declare as follows:

1. I am over the age of 18 years. I am a resident of the State of California and I have personal knowledge of the matters set forth herein. If called upon as a witness herein I could testify competently as to the matters set forth herein.

2. Having been retained and designated as an expert witness in the Church of Scientology International vs Steven Fishman and Uwe Geertz law suit, I am responding to several declarations submitted by Messrs. Lubell, Moxon, Bowles, Miscavige, Starkey, Mithoff, and others on February 17, 1994 along with the Church of Scientology International's ("CSI") Memorandum of Points and Authorities in Support of Motion to Dismiss, dated February 16, 1994.

3. It is significant to note the hateful and vengeful emotions the aforementioned Scientologists entertain toward their critics such as Dr. Uwe Geertz, Steven Fishman ("Fishman"), their attorneys, Vaughn and Stacy Young and others. These emotions and their ensuing acts, have been dominant toward CSI critics for decades. They originate in the very policies and bulletins written by L. Ron Hubbard ("Hubbard") included herein.

4. It is apparent that the CSI vs Steven Fishman and Uwe Geertz law suit was designed exactly according to Hubbard's policies so as to do the very acts to Dr. Geertz and Fishman that CSI and the Religious Technology Center ("RTC") and Author Services, Incorporated ("ASI") claim is being done to them.

PERSONAL BACKGROUND.

5. I was a Scientologist for twenty years. I became an adherent after reading Hubbard's book, Dianetics The Modern Science

of Mental Health ("DMSMH") in 1965 in South Africa. I started auditor training in Johannesburg then went to Saint Hill, England and received advanced auditor training through Level 7, the highest auditor and case supervisor training level available at that time. I also completed Hubbard's Organization Executive Course, a multi-volume course covering all Hubbard's organizing, business management, finance, establishment, promotional and public relations policies and procedures, during which I learned how to run a Scientology Organization.

6. I received auditing up through the state called "Clear." Hubbard's Technical Dictionary contains thirteen definitions for the state, attached hereto as **Exhibit** 1, some of which are: "*A Clear, in an absolute sense, would be someone who could confront anything and everything in the past, present and future.*" (Taken in part from Ability Minor Magazine Number 256); "*A Clear has no vicious reaction mind and operates at total mental capacity just like the first book (Dianetics The Modern Science of Mental Health) said. In fact every early definition of Clear is found to be correct.*" (Taken in part from Hubbard Bulletin 2 April 1965, "The Road to Clear"); "*To clear: to release all the physical pain and painful emotion from the life of an individual.*" (Taken from Hubbard's book, DMSMH.)

7. I served one year as contracted staff at the Los Angeles Organization in 1966 and 1967 after which, by special invitation, I joined Hubbard's Sea Project[1] in Las Palmas, Canary Islands.

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[1] Sea Project - The first phase of Hubbard's gradual move from his English worldwide headquarters at Saint Hill Manor, Sussex, in 1966 onto a small yacht, the "Enchanter", which was manned by Scientologists. The yacht sailed in English waters. In 1967 Hubbard accrued a second ship, the "Avon River," also manned by

Hubbard assumed the title of Commodore[2] in 1966 or 1967. The Sea Project grew into the Sea Organization[3] ("Sea Org") which was looked upon as Scientology's 'elite.' Even though we were Scientologists and ordained ministers, Hubbard had us wear naval type uniforms and insignia, and sign billion year contracts. For the next eight years through 1975, I served on two of Hubbard's ships, on the "Avon River," later renamed the "Athena" and the "Royal Scotman," later renamed the "Apollo." I held positions including those of Ship's Captain, Deputy Captain, Commodore's Staff Aide, Deputy Commodore for the United States and others, and was immediately subordinate to Hubbard for most of this time.

8. Hubbard once spoke about his strategies for "handling" his enemies. The best way was to, literally, drive them crazy, to use all one's resources to find their weaknesses and hit them hardest where it hurt the most. He said there were few men in history who mastered the techniques to do so successfully. He intimated he was

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Scientologists. Both ships were sailed to the Canary Islands to join Hubbard who was already living there.

[2] Commodore - the rank which Hubbard held in the Sea Organization, the head of the flotilla and related organizations which carried out and helped him to carry out his duties. (Taken in part from Hubbard's Flag Order 3342.)

[3] Sea Organization - "... is composed of the "aristocracy" of Scientology ..." (Taken in part from Hubbard's Flag Order 508.) "... In 1968 the Sea Org became a goodwill activity and an efficient administrative arm of Scientology. The Sea Org runs the Advanced Organizations and is the custodian of the Clear and OT [upper level sacred scriptures] processing materials." (Taken in part from Ron's [Hubbard's] Journal 1968.) "... a fraternal organization existing within the formalized structure of the churches or Scientology. It consists of highly dedicated members of the Church. These members take vows of eternal service. The Sea Organization life style of community living is traditional to religious orders. (Taken in part from Board Policy Letter 9 March 1974).

one.

9. By 1975, Hubbard's auditing techniques were already affecting me negatively. I had almost constant migraine headaches and was scared that Hubbard's techniques no longer worked on me.

10. In October 1975, Hubbard moved his organization ashore to Clearwater, Florida. From then on to the early 1980s, I got worse. I couldn't get medication strong enough to stop the never ending pain. By early 1976, I developed suicidal ideation because I couldn't conceive any other way to stop the pain. It continued unabated until well after I left the Sea Org in March 1982.

11. In 1984, I experienced a disaster with a CSI front group, Sterling Management Systems ("SMS"). SMS promoted Hubbard's business management policies to doctors, dentists and chiropractors to way to expand their business and double their income. SMS claimed no connection to CSI though its consultants, including myself, knew otherwise. The despicable treatment I saw meted out to two decent dentists in a San Bernadino clinic, and to me and my superior, by Sterling staff and by Scientologists, shocked me so deeply that I left CSI. Both dentists paid for expensive SMS consultants to introduce Hubbard's management techniques into their practice, train their employees and double their income by year's end.

12. The dentists were pushed to buy a CSI auditing package for nearly $1,000 an hour, with a minimum of 25 hours, for each dentist. They saw their budget overextend and put a stop on the check. On the same day, the dentists heard one of their SMS consultants, who touted no connection between SMS and CSI, talk about the transgressions they had divulged to their auditors in confidential

priest-penitent auditing sessions. The same day, one dentist's wife bought home a pack of critical CSI news articles from the public library.

13. SMS and CSI went into overdrive and the screaming and duress began. The dentists were threatened: to make the check good one dentist was blackmailed and the other was told he would reincarnate as a rock in his next life. My superior and I were fired two weeks later, and I left Scientology forever.

14. I then began a long recovery, searching for answers as to why I joined Scientology and gave it twenty years of my life only to end up suicidal and in chronic ill health.

SCIENTOLOGY POLICY ESTABLISHING LINES OF AUTHORITY WITHIN SCIENTOLOGY.

15. In order to understand how Hubbard directed Scientology throughout its myriad corporations almost up to his death in 1986 and how the authority he created has continued thereafter, one has to understand his foundational policies[4]. Hubbard's policies established all lines of authority, corporate structures and job descriptions in CSI. His policies had seniority over those of others without exception, regardless of corporate or organization positions. His policies were permanently valid unless cancelled by Hubbard himself.

16. Hubbard Policy of 13 March 1966, "Orders, Precedence of Personnel, Titles Of," attached hereto as **Exhibit 2**, states, "*The following table gives the precedence ... of orders or directions in Scientology. This table shows what order to follow first and if one*

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[4] Policies - the principles or laws by which the conduct of affairs can be guided; the laws on which orders are originated and authorized; the rules of the group.

below is contrary to one above, follow the upper one." (emphasis added) The first three entries are Board Resolution, Policy signed by Hubbard, Bulletin signed by Hubbard, and so on down the chart. Orders originated and signed by others come after these four. The policy continues, "*No order lower on the scale may cancel or set aside an order above it on the scale ... Any written or published order may be cancelled by a published order senior to it on the above chart except that, traditionally, **board minutes cannot cancel policy letters or bulletins, these being originated or modified by** the Executive Director whose powers only are ratified by the board.*"

17. On 13 August 1967, during the early days of the Sea Project, Hubbard wrote Flag Order[5] #5, "Staff Conduct," attached hereto as **Exhibit 3**. It states, "*The order of importance of ... orders is: (a) Commodore's (Hubbard's) concerns first, (b) others second. Do both. Both are important.*" This Flag Order was never cancelled by Hubbard.

18. In 1978 Hubbard wrote, "The Code of a Sea Org Member," attached hereto as **Exhibit 4**. It states, "*I promise to uphold, forward and carry out Command Intention*[6]." This Code was never cancelled by Hubbard.

19. Another Hubbard policy of 24 September 1970, "Issues[7]-Types Of," attached hereto as **Exhibit 5**, clarified the value of

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[5] Flag Order - the equivalent to a policy in the Sea Org.

[6] Command Intention - an idea or impulse that Hubbard was going to accomplish. It was intentional, meaning that Hubbard meant to do it.

[7] Issues - the policies, bulletins, directives of various kinds, evaluations, plans, programs, projects and printed orders which were distributed throughout world wide Scientology or which were originated by and distributed within a single Scientology organization or group only.

various major types of issues: *"HCOPL - Hubbard Communications Office Policy Letter. Written by LRH only. This is a permanently valid issue of all third dynamic (group), org and administrative technology ... HCOBs - Hubbard Communications Office Bulletins. Written by LRH only. These are the technical issue line. They are valid from first issue unless specifically cancelled ... The above are the ... main lines of issue of valid data. They have first priority on mimeo and in distribution."* This policy was never cancelled by Hubbard.

20. A later CSI Policy Directive #19 of 7 July 1982, "The Integrity of Source," attached hereto as **Exhibit 6**, stated, *"It is hereafter firm Church policy that LRH ISSUES ARE TO BE LEFT INTACT AS ISSUED. No one except LRH may cancel his issues. No one except LRH can revise his issues ..."* It was written and issued by the Watchdog Committee, a division of CSI.

21. These Hubbard policies laid an automatic response into Sea Org members and Scientologists - that their first loyalty was to Hubbard as head of the Sea Org and Scientology, not to the Commanding Officer of their own organization and even less so to their direct organization superior. This loyalty remains so into the present. Current and former Scientologists would all say that they would follow Hubbard's orders or a Commodore's Messenger's[8] orders rather than that of their Commanding Officer, attached hereto as **Exhibit 7**.

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[8] Commodore's Messenger - a direct representative of Hubbard, the Commodore. The orders of a Commodore's Messenger are considered as those of the Commodore, as per Hubbard Flag Order 3729 of 15 September 1978, "COMMODORE'S MESSENGERS," attached hereto as **Exhibit H**.

MISREPRESENTATIONS AND CONCEALMENTS IN DECLARATION OF DAVID MISCAVIGE. Misrepresentation That Criminal Acts Done in the Past Were Aberrational Acts By The Discredited And Defunct Guardian Office Rather Than Mandated By Hubbard's Policy.

22. David Miscavige ("Miscavige"), in his February 17, 1994 declaration filed herein, misdirects the attention of this Court by misrepresenting that criminal acts done in the past were aberrational acts by the discredited and defunct Guardian Office ("GO") and concealing that such criminal acts were, and still are, mandated by Hubbard's policy. (Miscavige declaration, pages 19 and 26). He also said (page 39), "... the only reason that the Youngs feel safe enough to make their outrageously false allegations of bad conduct and harassment against the Church and me is because they know there will be no "Fair Game" retaliation, thanks to my kicking out the GO and putting a permanent end to their abuses." (Miscavige declaration, page 39).

23. Miscavige's claims are false. The defunct GO is the wrong direction to look for blame and the wrong source to focus it on.

24. To look in the right direction and at the right source, one must go to Hubbard's own policies.

25. In a taped lecture in June 1952, "The Journal of Scientology, Issue 18-G," attached hereto as **Exhibit 8**, pages 1 and 2, Hubbard said, "*The only way you can control people is to lie to them ... When you find an individual is lying to you, you know that the individual is trying to control you. That is the mechanism of control.....Not "is going to", but "is lying to you*." This taped lecture was never cancelled by Hubbard.

26. A Hubbard bulletin of 5 November 1967, "Critics of

Scientology", attached hereto as **Exhibit 9**, states, "*Now, get this as a technical fact, not a hopeful idea. Every time we have investigated the background of a critic of Scientology, we have found crimes for which that person or group could be imprisoned under existing law. We do not find critics of Scientology who do not have criminal pasts. Over and over we prove this.*" Hubbard continued on page 2, "*Two things operate here. Criminals hate anything that helps anyone, instinctively. And just as instinctively a criminal fights anything that may disclose his past ... If you, the criticized, are savage enough and insistent enough in your demand for the crime, you'll get the text, meter*[9] *or no meter. Never discuss Scientology with the critic. Just discuss his or her crimes, known and unknown. And act completely confident that those crimes exist. Because they do.*" This is a key Hubbard bulletin which lays the foundation for the beliefs and the actions of Scientologists. Other Hubbard writings amplify it. This bulletin was never cancelled by Hubbard.

27. In mid-March 1955, Hubbard wrote the "Dissemination of Material," attached hereto as **Exhibit 10**, which states: "*The purpose of the suit is to harass and discourage rather than to win. The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway ... will generally be sufficient to cause his professional decease. If possible, of course, ruin him utterly.*" This article was never cancelled by Hubbard.

28. Hubbard's policy of 15 August 1960, "Dept of Govt

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[9] Meter or E-meter - Hubbard's electrometer. A skin galvanometer which registers changes in the skin's temperature and moisture.

Affairs," attached hereto as **Exhibit 11**, states: *(3) Make enough threat or clamor to cause the enemy to quail ... (6) If attacked on some vulnerable point by anyone or ... any organization, always find or manufacture enough threat against them [emphasis added] to cause them to sue for peace. Don't ever defend. Always attack. Don't ever do nothing. Unexpected attacks in the rear of the enemy's front ranks works best."* This policy was never cancelled by Hubbard.

29. Hubbard policy of 25 February 1966, "Attacks on Scientology," attached hereto as **Exhibit 12**, states, Scientology must respond to attacks by "*... attacking the attackers only. NEVER agree to an investigation of Scientology. ONLY agree to an investigation of the attackers. This is the correct procedure: (1) Spot who is attacking us. (2) Start investigating them promptly for FELONIES or worse using our own professionals, not outside agencies ... (4) Start feeding lurid, blood, sex, crime, actual evidence on the attackers to the press. Don't ever tamely submit to an investigation of us. Make it tough, rough on attackers all the way.... There has never yet been an attacker who was not reeking with crime. All we had to do was look for it and murder would come out."* This policy was never cancelled by Hubbard.

MISREPRESENTATIONS ABOUT FAIR GAME.

30. Miscavige brought up Hubbard's policy on the "FAIR GAME LAW" in his February 17, 1994 declaration attached hereto, page 39, saying there would be no "Fair Game" retaliation on Vaughn and Stacy Young who, like my husband and me, are speaking out about CSI. This is false.

31. The first Hubbard policy on "Fair Game" was printed 1st

March 1965, "JUSTICE SUPPRESSIVE ACTS SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS THE FAIR GAME LAW," attached herein as **Exhibit 13.** It states: "*By FAIR GAME is meant, without rights for self, possessions or position, and no Scientologist may be brought before a Committee of Evidence or punished for any action taken against a Suppressive Person*[10] *or Group during the period that person or group is "fair game ... Such Suppressive Acts include ... Ist degree murder, arson, disintegration of persons or belongings not guilty of suppressive acts (emphasis added)...*" Hubbard thus gave Scientologists carte blanche to commit criminal acts against anyone declared a suppressive person. Despite Scientologists' protestations that the policy does not exist or never existed, I was a student at Saint Hill Manor, England in late 1965 when I was required to study it.

32. These Hubbard policies are not philosophical. They are functional; they are the guide to how CSI and RTC operate, how the GO operated, and how its successor, Office of Special Affairs ("OSA"), a division of CSI, operates.

33. After the policy's distribution, there was so much media and public outcry against it, that Hubbard revised it and deleted the underlined phrase above. The most recent revision, Hubbard Policy of 23 December 1965 revised 8 January 1991, "SUPPRESSIVE ACTS SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS," attached hereto as **Exhibit 14**, bears little similarity to the earliest 1 March 1965 edition.

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[10] Suppressive Person - Hubbard's term for someone who continually sins, who messes up everything and everyone, and who is psychotic or insane. The term is also used for critics of Scientology.

34. A further Hubbard policy ordered upper level OT[11] graduates to commit criminal acts on suppressive persons. It is, "O.T. REGULATIONS," of 30 September 1966, attached hereto as **Exhibit 15.** It states, "*No Operating Thetan may engage in a suppressive action against any person, state or country in the absence of an ... Ethics Order*[12] *labeling the person, state or country suppressive. Such orders must be obtained beforehand.*" This policy was never cancelled by Hubbard.

35. A later Hubbard policy of 18 October 1967, "PENALTIES FOR LOWER CONDITIONS[13]," attached hereto as **Exhibit 16**, states: "*SP Order. Fair Game. May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed.*" This policy was never cancelled by Hubbard.

36. The action of declaring people suppressive persons still continues in all Scientology Organizations.

MISREPRESENTATIONS ABOUT THE CANCELLATION OF FAIR GAME.

37. Scientologists argue interminably that Hubbard's "Fair Game" policy was cancelled in 1968 and again later, that it never existed, that because it doesn't appear in the 1991 policy manuals it doesn't exist, and more. A review of "Fair Game" cancellations

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[11] OT - also Operating Thetan (spirit or soul). The highest state there is according to Hubbard. A real OT has no reactive mind and is cause over matter, energy, space, time and thought and is completely free; he can exist with or without a body.

[12] Ethics Order - a printed order on gold colored paper which convenes an investigation or disciplinary court, or which contains the resulting disciplinary actions ordered.

[13] Conditions - states of existence, in this case showing whether the person is successful or not. Each 'condition' contains a formula for application which, if done correctly, is supposed to increase the person's success.

shows this is false.

38. Hubbard policy of 21 October 1968, "CANCELLATION OF FAIR GAME," attached hereto as **Exhibit 17**, a key policy quoted by Scientologists as purportedly cancelling "FAIR GAME," in fact upholds the "Fair Game" treatment of suppressive persons with criminal acts. It states, *"The practice of declaring people FAIR GAME will cease. FAIR GAME may not appear on any Ethics Order. It causes bad public relations. This P/L does not cancel any policy on the treatment or handling of an SP*" (emphasis added). This meant that a declared suppressive person or SP was still subject to the practice and acts ordered by "Fair Game." He just was not labelled "Fair Game" anymore.

39. An affidavit written by Hubbard on March 1976, attached hereto as **Exhibit 18**, though claimed by Scientologists to cancel "FAIR GAME," fails to do so.

40. An 8 June 1979, order titled, "DECLARE," attached hereto as **Exhibit 19**, quotes Hubbard's "Fair Game" policy of 23 December 1965 and the words "THE FAIR GAME LAW." This was well after any Hubbard "cancellations."

41. In a 16 December 1980 "Sentencing Memorandum of the United States of America," attached hereto as **Exhibit 20**, US Attorney Ruff and US Assistant Attorneys Banoun, Hetherton and Winfree wrote that, "the fair game policy continued in effect well after the indictment in this case and the conviction of the first nine co-defendants. Defendants claim that the policy was abrogated by the Church's Board of Directors in late July or early August, 1980, only after the defendants' personal attack on Judge Richey." (Sentencing Memorandum, page 16 footnote)

42. Several Courts found that CSI continued applying the "Fair Game" doctrine beyond any time the Church said it was cancelled, such as Judge Breckenridge in his decision of June 22, 1984, in Church of Scientology of California vs Gerald Armstrong, specifically pages 8, 11 and 13, attached hereto as **Exhibit 21**.

43. A further purported "Fair Game" cancellation of 22 July 1980, "ETHICS CANCELLATION OF FAIR GAME, MORE ABOUT," attached hereto as **Exhibit 22**, also did not conceal the practice. It wasn't even written by Hubbard but by "The Boards of Directors of the Churches of Scientology," so, by Hubbard's own rules quoted in paragraphs 16 to 21, this "cancellation" did not have the authority to cancel Hubbard's "Fair Game" policy.

44. That "Fair Game," including criminal action and massive financial fraud continue and which implicates Miscavige himself, occurred in San Francisco, on 17 October 1982.

44a. Seven top Scientologists held a conference of United States Mission Holders[14] in the San Francisco Hilton Hotel. They were Miscavige, Norman Starkey ("Starkey"), Marc Yager ("Yager"), Lyman Spurlock ("Spurlock"), Ray Mithoff ("Mithoff"), Guillaume Lesevre ("Lesevre") and Steve Marlowe ("Marlowe"), attached hereto in **Exhibits 23 and 24**.

44b. **Exhibit 23** shows the seven men at a table with Starkey talking at the microphone. Miscavige is behind the microphone, looking up at Starkey. They are all in Sea Org Officer uniform, with lanyards and service ribbons. Miscavige was a Commander, Starkey a Commander, Yager a Captain, Spurlock a Warrant Officer,

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[14] Mission Holder - a Scientologist who owns a mission or franchise of CSI, and which offers basic, lower level auditing and training to the public at large.

Lesevre a Captain. Mithoff and Marlowe, who worked in the non-profit RTC, were both Commanders.

44c. The United States Mission Holders, with whom they were interacting, were licensed by a separate entity, Scientology Missions Int.("SMI"), operating within the non-profit CSI's corporate structure.

44d. The announced conference purpose was to make the Mission Holders unquestioningly compliant. **Miscavige personally** declared at least one Mission Holder a suppressive person, attached hereto as **Exhibit 25**, and said criminal charges were filed against him. This constituted the practice of "Fair Game." The conference resulted in massive intimidation and belittling of Mission Holders.

44e. What **Exhibits 23, 24 and 25** do not show, but what occurred in fact was an utter abandon of corporate integrity. The majority of these Officers held full time positions in the for profit AUTHOR SERVICE, INC. organization, yet represented themselves as non profit CHURCH OF SCIENTOLOGY INTERNATIONAL members and SEA ORG OFFICERS as well. (1) All seven men worked in tandem during this conference; (2) All seven men wore full Sea Org uniform and were introduced by their Sea Org ranks;

(3) Miscavige and Starkey held full time positions in the for profit ASI; Miscavige as ASI Chairman of the Board since March 1982 and Starkey as ASI Chief Executive; (4) Spurlock held a full time position in the for profit ASI as Corporate Affairs Director. (5) ASI supposedly acted as agent for Hubbard's fictional works, but in reality it was running the non-profit CSI and RTC, attached hereto as **Exhibit 26**, in trial testimony of Homer Schomer in JULIE CHRISTOFFERSON TITCHBOURNE vs. CHURCH OF SCIENTOLOGY, et al., pages

3598, 3605, 3607-8. (7) Marlowe, Lesevre and Mithoff were the only three who wore Sea Org Officer uniforms validly - they were Inspector General RTC, Executive Director Int. CSI, and Senior Case Supervisor Int. CSI respectively at the time, both RTC and CSI being non-profit corporations.

44f. What is also not seen in **Exhibits 23, 24 and 25**, is that the Mission Holder Conference was held to perpetrate an enormous financial fraud and scam on CSI and individual Mission Holders, and was done with the full knowledge and participation of Miscavige, others present as well as Hubbard as follows:

(1) Through massive intimidation and coercion ("Fair Game"), the wealthy and independent Mission Holders were forced to pay huge sums of money through CSI to ASI; (2) ASI funnelled the money through a Liberian shell corporation, Religious Research Foundation, and through Canada, into Hubbard's private bank accounts in Luxembourg and Lichtenstein; (3) During only part of 1982, over forty million dollars from the non-profit CSI was funnelled through the for profit ASI into Hubbard's personal bank accounts, attached hereto as **Exhibit 26**, according to trial testimony of Homer Schomer in JULIE CHRISTOFFERSON TITCHBOURNE vs. CHURCH OF SCIENTOLOGY, et al., pages 3609, 3611, 3614-3620, 3629-3630.

44g. This is only the tip of the iceberg concerning corporate integrity violations, which were standard operating procedure with Hubbard and which he passed on to his followers. Scientology management cannot succeed without such violations ... Hubbard's policies and procedures, only some of which mandate the authority and independence of Boards and Executive Directors, do not, in the main, tolerate this in practice.

44h. Miscavige's attempts to portray himself, CSI, RTC and ASI as having clean hands since the "demise" of the GO in 1981 are thus blatantly false, attached hereto as **Exhibits 23, 24, 25, and 26**, according to trial testimony of Homer Schomer in JULIE CHRISTOFFERSON TITCHBOURNE vs. CHURCH OF SCIENTOLOGY, et al., pages 3652 and 3659.

45. Hubbard was Miscavige's role model. Hubbard purportedly signed an "Agreement" on September 15, 1966, regarding his resignation, "*from all directorships of Church of Scientology effective September 1, 1966.*" I purportedly witnessed the agreement and signed it, "Hana Eltringham," my former name, attached hereto as **Exhibit 27**. The Agreement is false. In September 1966, I was a student auditor at Saint Hill, England, completing Class 7 auditor interne requirements in order to join my husband, Guy Eltringham, in Los Angeles. I was a nobody. Up to that time, I never met or spoke with Hubbard. I signed the Agreement either on board the "Avon River" or the "Royal Scotman" between August 1967 up to March 1969, when I was still a rising star in Hubbard's personal entourage.

46. "In 1983 and 1992, CSI printed and distributed two publications, each containing hundreds of Scientology and Sea Org members names who were declared suppressive persons. They are SO ED 2192 INT (Sea Org Executive Directive 2192 International) of 27 January 1983, "LIST OF DECLARED SUPPRESSIVE PERSONS" containing approximately 570 names, attached hereto as **Exhibit 28**. And FLAG ED 2830RB (Flag Executive Directive 2830RB) of 25 July 1992 containing approximately 415 groups and 2,230 individuals, attached hereto as **Exhibit 29**. Both my husband's and my name appear on these lists.

47. Arguing whether "Fair Game" is cancelled or not is the wrong issue. Scientologists continuously deny that Hubbard meant what he wrote in his first policy on "Fair Game." Hubbard does the same in his March 1975 Affidavit, attached herein as **Exhibit 18.** If so, why do Scientologists continue to practice "Fair Game?"

48. The record clearly shows that "Fair Game" continues. It is replete with harassment after harassment of current day critics, per paragraphs 64 through 93. It, and the other Hubbard policies, are the criminal legacy Hubbard passed onto his blindly loyal followers.

49. Further, if Hubbard's "Fair Game" policy was really cancelled and remains cancelled in the present, why weren't all the other Hubbard "fair game type" policies stricken out of the record long ago? Why are they reprinted in the 1991 Policy and Bulletin manuals?

50. It must be noted that this Court is not immune to the "Fair Game" treatment meted out by Scientologists to courts in the recent past. Some of these abuses are documented in the 1980 article, "Scientology's War Against Judges" attached hereto as **Exhibit 30,** and the 1993 article, "Churches Litany of Lawsuits," attached hereto as **Exhibit 31.** CSI's personal attack on Judge Ritchie is attached hereto in **Exhibit 20**, page 16 footnote. Another example is that of Judge Ideman as outlined in his declaration of 17 June 1993, attached hereto as **Exhibit 32.**

51. All Hubbard's works, including "Fair Game," constitute CSI's sacred scripture, attached hereto as **Exhibit 33**, page 24, "**Scriptures**: In the Scientology religion, the scriptures are all the spoken and written words of L. Ron Hubbard. The scriptures include

millions of written words contained in books, films, various forms of issues, and writings and several thousand tape recorded lectures."

52. This is the Hubbardian mindset which directed the criminal acts of the now-defunct GO, and which continues to direct the acts of all Hubbard's corporations today, both profit and non-profit.

53. I experienced this in 1968, when both the "Avon River," the ship I captained at the time, and the "Royal Scotman," Hubbard's Flag ship, were in Bizerte, Tunis, in North Africa. Two Sea Org Officers and I spoke on the dock one evening. They were both flying out the next day to Los Angeles, on a Hubbard assignment. They told me that Hubbard ordered them to shoot up Jack Horner, who lived in Los Angeles, a suppressive person whom Hubbard had personally declared some years earlier. Both men had hand guns and would travel with them. They left ... and then returned some weeks later. After their debrief they told me that Horner had indeed been shot at multiple times, while he and his family were in their home one evening. Fortunately, no one had been hurt.

THE CURRENT DECLARATIONS ARE A LAST DITCH EFFORT TO REWRITE HISTORY.

54. Scientologists, knowing their vulnerability to a motion for costs, attorneys' fees and sanctions based on bad faith litigation tactics and use of litigation for improper purposes, are attempting to rewrite Hubbard's criminal policies. One documented example is Hubbard's 1955 Article, "The Dissemination of Material." It states, "*The purpose of the suit is to harass and discourage rather than to win. The law can be used very easily to harass, and enough harassment on somebody ... will generally be sufficient to cause his professional decease. If possible, of course, ruin him*

utterly." It appears in the Technical Bulletin Volumes printed in 1976, attached hereto as **Exhibit 10.**

55. Despite policy which forbids Hubbard's writings being changed except by himself, the same article appeared without the quote in a 1986 Impact Magazine, after Hubbard's death, attached hereto as **Exhibit 34.** In the 1991 edition of the Technical Bulletin Volumes, the article also appears without the quote, attached hereto as **Exhibit 35.**

56. That Scientologists and the general public only see the watered down version since 1986, does not negate or minimize the validity of the original Hubbard order.

57. Nor does it prevent CSI from continuing to silence its critics by the misuse of the litigation process. OSA, a division of CSI, attached hereto as **Exhibit 36**, is the entity which took over from the infamous GO, as stated in an 18 May 1986 letter from OSA staff member, Lela, to Mike Meyers, attached herein as **Exhibit 37.** It states, "Dear Mike: Seven years ago you had some interest in USGO (the United States Guardian Office.) This group is now called Office of Special Affairs ..."

58. OSA is the entity responsible for carrying out "Fair Game" on critics and suppressive persons, and injuring, tricking, suing, lying or destroying them. It gathers overt and covert data on critics and enemies and runs overt/covert operations against them. It directs all litigation activities.

59. In his Memorandum of Points and Authorities filed on February 16, 1994, filed herein, Jonathon Lubell tries to portray the injustice of five CSI entertainers, Charles Durning, Kelly Preston, Maxine Nightingale, Juliette Lewis and Isaac Hayes, all

non-parties to the litigation, being served with subpoenas, (J. Lubell Memorandum of Points and Authorities, page 1 & 30), that discovery has been extensive, abusive and is a harass-to-default strategy (J. Lubell Memorandum of Points, pages 4 & 5), that deposition questions were abusive, irrelevant and harassing (J. Lubell Memorandum of Points, page 10), and that the deponents have no relevance to the case (J. Lubell Memorandum of Points, page 14).

60. Kendrick Moxon, CSI attorney, in his Declaration of February 14, 1994 filed herein, accuses Geertz's counsel of improper and abusive discovery tactics and seeking to provoke disputes and incite hostility (K. Moxon declaration pages 2 & 18).

61. Miscavige, in his Declaration of February 17, 1994, filed herein, protests he is accused of evading service (D. Miscavige declaration page 2), that he never received a subpoena (see D. Miscavige declaration page 8), and, that by attending the Corydon vs. CSI deposition, he was rewarded by being served with subpoenas in disrelated matters (Miscavige declaration page 9).

62. The truth is these tactics are common litigation practice by CSI attorneys and related personnel. They are sourced in Hubbard's policies and bulletins, attached hereto as **Exhibits 8 to 16**, as they were in the heyday of the defunct GO. Their compliance in the present is unquestioningly demanded just as it was then.

PERSONAL EXPOSURE TO "FAIR GAME" TACTICS.

63. My husband and I became well acquainted with "Fair Game" tactics over the past seven years. We work with families who have a loved one in CSI, and at their request, conduct voluntary interventions during which the loved one can obtain information to make a more informed choice about his affiliations. Because of

this, Mr. Moxon and other CSI lawyers and hordes of their P.I.s and agents have repeatedly tried to prove; (1) we are kidnappers, (2) we are deprogrammers, and forcibly, physically and mentally assault and harm and injure Scientologists, (3) we are agents of cult awareness groups; (4) we kickback to such groups, (5) and much more. Despite all their posturing, neither CSI, RTC or any other Scientology organization has presented one bit of evidence to back their allegations. Why? Because we do not do the actions of which they accuse us.

64. In 1986, P.I. Al Bei of Ingram Detective Agency, called upon Jerry's elderly father in New Mexico, falsely representing himself as a Federal Investigator, saying that Jerry's father could answer questions about Jerry then and there or else be subpoenaed to answer the questions in a California court. Al Bei also divulged personal information about Jerry to his father which could only have come from Jerry's confidential priest-penitent CSI preclear folder. Attached hereto as **Exhibit 38.**

Jerry's sister also wrote a report on the incident, attached hereto as **Exhibit 39.**

65. In 1989, a CSI front group in Glendale, SMS, found a bomb threat note in their men's washroom, attached hereto as **Exhibit 40.** My husband's name was one of ten top suspects. Don Yaeger, an Investigator for the Glendale Fire Department, and Dan Becker, a P.I. assisting Yaeger, were in possession of a sample of my husband's printing - the bomb threat was hand printed. It did not, though, match my husband's printing. We took the opportunity to educate both men on CSI's "Fair Game" tactics and harassment operations, such as the false bomb threat manufactured by

Scientologists against New York freelance writer, Paulette Cooper, who was a very vocal Scientology critic in the 1970s and the years of unmitigated harassment they dealt her, attached here to as **Exhibit 41,** (transcript of Cooper's testimony in the 1984 Clearwater, Florida, hearings into CSI).

66. Over five years, CSI (at least) has compiled dossiers of spurious information on my husband and me. They are evolving documents, sometimes distributed as a dossier on each of us, sometimes as one on both of us. The latest edition is attached herein as **Exhibit 42.**

67. Since 1991, innumerable copies have been handed in person or mailed to our friends, colleagues, associates,and even people we do not know in the USA, England and Australia.

68. In November 1993, my husband and I attended a Cult Awareness Conference in Minneapolis. I found dossiers about me in the ladies washroom. Dossiers about my husband were found in the men's washroom. Scientologists handed copies of the packs to conference attendees.

69. In 1991, someone impersonating my husband called American Express and obtained three months worth of our statements. In 1992 someone called inquiring into other credit cards. In 1993 the same occurred.

70. Repeated attempts were made for more than five years to obtain our phone account information, and failing that, to determine what calls we make to certain area codes at certain times. (Someone was trying to find out which phone numbers we called long distance, and therefore which families we were working with.)

71. Between 1991 and 1993, at least fifty of our family

members, friends, acquaintances and associates, including people we did not know up to that point, were phoned or visited by CSI hired Private Investigator John J. Gaw, and at times other P.I.s, asking questions about us, our backgrounds, families, education, work and clients and making false and/or derogatory innuendos. The P.I.s used many "fronts," such as: (1) they needed a deprogrammer to get their Scientology child out of the group; (2) we owed an East Coast client a lot of money and refused to pay him or take his calls; did the person know whether we had other disgruntled clients? (3) they needed a deprogrammer and were the Whitfields any good; (4) and many more.

72. During 1991, in England, we worked with a family whose son was a Scientologist. Someone impersonating my husband's elderly father called an English friend begging and pleading for our phone number in England, saying it was a matter of great urgency. Our friend finally gave the number, thinking the caller was genuine. Within hours, our Bed & Breakfast was surrounded by at least five cars driven by Scientologists. We were under heavy P.I. surveillance from then on. The P.I.s photographed us from their cars as well as their second floor stake-out room in the Bed & Breakfast across the road. The P.I.s room contained expensive surveillance equipment aimed at our Bed & Breakfast twenty four hours a day. The surveillance continued around the clock for a week. Our landlady was followed when she went shopping. The head of OSA, a division of CSI, in England, Ms. Barbara Bradley, told the police that my husband and I had kidnapped and were holding two people against their will in our Bed & Breakfast. The police investigated. They found the report false.

73. In August 1991, my husband was subpoenaed in, Friend vs. Church of Scientology International. Even though my husband never met or spoke with Roxanne Friend and provided a declaration to that effect, he was the first person to be subpoenaed, attached hereto as **Exhibit 43**.

74. In late 1991, someone called a friend of ours in England, long distance. The person, identifying himself only as an interviewer from a New York TV station, said he was calling urgently for Hana Whitfield and needed to know my phone number and location in England. No one in a New York or other American TV station knew I was in England. (Someone was trying to locate us and find out which family we were working with.)

75. We receive many phone calls from families requesting information on Scientology and assistance. We learned rapidly to determine which calls were genuine and which were not.

76. We were under surveillance for months on and off. In 1993 I had three to five cars, as well as two people on motor bikes, monitoring me all at the same time. We were photographed and video taped innumerable times and also covertly tape recorded many times.

77. P.I. John Gaw filed a complaint with the Board of Behavioral Science Examiners in Sacramento, attached hereto as **Exhibit 44**, that we practice counseling or interventions without a license. We don't counsel, now have we ever called ourselves counsellors. Nothing came of the report.

78. The Zoning Commission said our neighbors were complaining because there were too many people visiting our home. We have very few visitors, a friend now and then, and are on extremely good terms with our neighbors. So we knew the complaint was false.

79. Scientologists falsely defamed my husband as a child beater, a wife beater, a drug dealer, addict and thief. They falsely accused him of "stealing" Narconon, a CSI front group and drug treatment center, attached in **Exhibit 42**, page 1.

80. Scientologists accuse me of potential violence because I took Prozac. However, what it did was help resolve the chronic, debilitating depression and mental "fragmentation" brought on by Hubbard's dangerous auditing techniques and CSI's intense high demands, duress and manipulations.

81. We were repeatedly called kidnappers and deprogrammers and accused of "brutally ripping peoples' beliefs from their minds," in CSI publications and on TV and radio programs.

82. In 1992 we were sued for "false imprisonment," attached hereto as **Exhibit 45**, by Scientologist Casillas ("Casillas"), who ran surveillance on my husband and me for days. An LAPD Officer stopped Casillas for driving without a license plate and cuffed him while he checked Casillas and the car. Casillas was then released, attached hereto as **Exhibit 46**. The result? We were sued.

83. On March 14, 1993, the CSI law firm Bowles & Moxon, flew a young man, Curtis Harmon; from Seattle, Washington State, to Los Angeles to depose him. (Earlier, my husband, I and Mr. Harmon, arranged an intervention after which Curtis left CSI.) Eugene Ingram, a CSI P.I., told Curtis that unless Curtis agreed to be deposed, he would lose his relationship with his Scientology mother. So Curtis went through ten hours of video deposition in which he was asked the same questions repeatedly. Afterwards, he was given an affidavit, attached hereto as **Exhibit 47**, which drafted and typed for Curtis' signature. It contained statements contrary to those he

said in the deposition, but, because he was exhausted and afraid of losing his mother, he signed. On the 23rd March, Curtis wrote a second affidavit in Seattle to correct the first, attached hereto as **Exhibit 48**, stating, "... I was asked the same question over and over in many different ways until I agreed to one small part of what they were talking about, but then it would be twisted to fit what they wanted to hear. Even when I would say I didn't really remember or didn't really know for sure, it would end up in the Affidavit anyway." (C. Harmon affidavit of March 23, 1993, page 1).

84. On April 13, 1993, my husband and I were served with two subpoenas each in the CSI vs. IRS case, and the Kevin Harness vs. Cult Awareness Network, et al.,In Re: CAN Coordinated Cases, attached herein as **Exhibit 49**. The two subpoenas were handed to each of us three times that day by three different people, once in Logan Airport, Boston, by an OSA staff member, Jane Parker, a second time by a man as we waited to board our plane, and the third time by Scientologist Andrew Bagley and another man after we arrived at LAX airport. My husband and I were non parties.

85. Sometime in May 1993, I was served with a subpoena in the (Scientologist) Philip Hart vs. Cult Awareness Network case. On May 4, 1992, our attorney filed a protective order, attached herein as **Exhibit 50**, Protective Order of 4 May 1992, pages 4 to 9.

86. Miscavige claims in his February 17, 1994 declaration that he was "rewarded (after deposition in Corydon vs. CSI) by having plaintiff's counsel serve me with various subpoenas in other disrelated matters." CSI did the same to my husband and me. In June 1993, we were deposed by CSI lawyer K. Moxon in a CSI vs. IRS

case. We were non parties. The questions were irrelevant, harassing and went into irrelevant issues. Moxon then served us with subpoenas in another unrelated case.

87. On June 25, 1993, I was deposed in a second CSI vs. IRS case - I don't know title or number. I was a non party.

88. On June 30, 1993, my husband and I were deposed in the Harness vs. Cult Awareness Network combined case as non-parties. Neither my husband nor I know Mr. Harness.

89. During the latter half of 1993, I and my husband were served with subpoenas in the Emery Wilson Corporation DBA Sterling Management Systems vs. Cult Awareness Network Et Al as non-parties. Due to harassment my husband experienced in his deposition, our attorney filed a Protective Order for me, attached herein as **Exhibit 51**, because my husband was subjected to extensive harassment regarding not only our intervention activities but also our confidential financial affairs and associations, even though the court ordered all allegations about deprogramming and exit counselling to be stricken. None of the questioning was discoverable as a matter of right. It was clear we were being sought for an improper purpose.

90. In September 1993, I learned of further "Fair Game" and harassing tactics initiated by CSI and RTC against me because I am a Scientology critic. John Richardson ("Richardson") of Premiere Magazine, wrote that Marty Rathbun, RTC Inspector General for Ethics, and Heber Jentzsch, CSI President, claimed I was an accomplice in the tragic murder of my father 30 years ago, attached hereto as **Exhibit 52** of September 1993, page 91. This is blatantly and completely false.

91. In early November 1993, my husband and I attended a Cult Awareness Convention in Minneapolis. Three Scientologists, Carly Swirtz, Jane Parker (OSA staff) and Jennie Walker, handed out earlier versions of the spurious dossier on my husband and me, attached hereto as **Exhibit 42**.

92. In 1993, groups of people, among them Scientologists, demonstrated outside our home in Silverlake, Los Angeles, waving placards stating "Hate Mongerers [sic] get out of Silverlake" and "Stop religious bigotry." They handed leaflets, attached hereto as **Exhibit 53**, to neighbors and passers by, which say, "WHICH HUSBAND AND WIFE TEAM BREAKS UP FAMILIES FOR $1,500 A DAY?" and then give our names. They falsely state that we are violent kidnappers, our actions are terroristic, that I tried to kill my father with a gun then changed my name and fled South Africa.

93. These actions are the practices of "Fair Game." They show that Hubbard's "Fair Game" doctrine is alive despite supposed cancellations, and is practiced by CSI and RTC.

94. CSI lawyer, Jonathon Lubell, says in his February 16, 1994 Memorandum of Points and Authorities, attached herein, that CSI religious tenets and scriptures have been assailed (page 2), that certain religious writings called upper level materials are held to be strictly confidential as a matter of religious precept (page 12), that there is a precise path to spiritual freedom that one walks one step at a time (page 13), non-party entertainers who have not achieved this level will be at risk (page 14).

95. CSI lawyer, Tim Bowles, states in his February 16, 1994 declaration that the insertion of altered or recreated versions of CSI's upper level scriptures into the court record would violate the

religion's deep belief that such are confidential (page 5).

96. Both the above statements are invalid and attempt to cloud the Courts perception of these upper level scriptures or materials. The upper levels start at Operating Thetan One, or OT 1, and advance up through OT 8. They are strictly confidential within CSI. A Scientologist can only get onto a higher OT level by satisfactorily completing the earlier one and paying for the next one.

97. OT 1, in summary, consists of walking around and observing one's surroundings in different ways so as to familiarize oneself, as a new "Clear," to one's environment.

98. OT 2, attached hereto in part as **Exhibit 54**, consists of running out or deleting past life "implants[15]."

99. OT 3, attached hereto in part as **Exhibit 55**, of all the OT levels, attracts the most criticism. It consists of telepathically locating "body thetans[16]," also called BTs, which are stuck to one's body. Each BT is then individually audited on techniques to erase the implants it forcibly received 75 million years ago from a despotic ruler named Xemu (sometimes spelt Xenu). Hubbard called OT 3 the "Wall of Fire, attached hereto as **Exhibit 56**, pg 2. The BT then leaves and goes on its way or reincarnates into its next life as a human being. The next BT is then located and audited until it leaves ... and so on. Each person has hundreds of thousands of BTs

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[15] Implants - artificial and false concepts and purposes which were intentionally installed into people up to trillions of years ago (see OT II DATA SHEET and pages 9, 10 and 11) through force and pain so as to control and suppress people them.

[16] Body Thetan - also called BT. A body thetan, or a BT, is a spirit or soul attached to the surface of one's body or inside one's body. Every man, woman and child has hundreds of thousands of BTs attached to his or her body and inside it as well.

on his body and inside it. Ridding oneself of concentrated quantities of BTs is akin to performing a religious practice of exorcism on oneself.

100. OT 4 through OT 7 consist of exorcising more lawyers of BTs, though each new OT level utilizes different techniques.

98. Having seen CSI's OT levels printed in publications like the Los Angeles Times, the Washington Post and books, I can verify that they are Hubbard's exact upper level materials as written by him and which I audited from 1968 onward.

101. A significant reversal, a manipulation, occurs in Hubbard's cosmology between the state of Clear and the OT 3 level. As a Scientologist gets to Clear, he learns and believes that all his physical and psychosomatic ills will be eradicated forever. He learns from Hubbard's article, "The State of Clear," that, "*A clear can be tested for any and all psychoses, neuroses, compulsions and repressions (all aberrations) and can be examined for any autogenetic (self-generated) diseases referred to as psychosomatic ills. These tests confirm the clear to be entirely without such ills or aberrations. Additional tests of his intelligence indicate it to be high above the current norm,*" attached hereto as **Exhibit 57**.

102. He learns from Hubbard's bulletin, "TECHNICAL BULLETIN OF 22 JULY 1956," attached hereto as **Exhibit 58**, that "*We are now capable of solving cases to the extreme level of clear ... We have created the permanent stable clear.*"

103. He learns from Hubbard's 1958 "The Freedoms of Clear," attached hereto as **Exhibit 59**, that "*In clearing people we achieve four freedoms, and I'll enumerate them for you ... The first one is*

illness ... Next we have freedom from pain ... The next ... is freedom from ignorance ... a thetan knows everything ... The last part of these freedoms is the most controversial of them all: death (emphasis added)."

104. He also learns from Hubbard's 2 April 1965 bulletin, "The Road to Clear," attached hereto as **Exhibit 60**, that, "*I have just made a breakthrough in finding what a clear really is ... A clear has no vicious reactive mind and operates at total mental capacity like the first book*[17] *said. In fact every early definition of CLEAR is found to be correct ... But at its end, MAGIC ... There's the state of clear we've sought for all these years. It fits all definitions ever given for clear.*"

105. He learns from Hubbard's bulletin of 23 August 1966, "CLEAR TEST," that the first Clear, John McMaster, achieved Clear, attached hereto as **Exhibit 61**, and that, "no doubt exists that he has erased his bank[18] completely and its gone."

106. He learns from a "GO CLEAR" advertisement, attached hereto as **Exhibit 62**, that "A Clear is a being who can be at cause knowingly and at will over mental matter, energy, space and time as regards the First dynamic[19] ... It is a stable state ... A Clear has over 135 I.Q., a vibrant personality, glowing health, good memory, amazing vitality, self-control, happiness and more." There are many

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[17] first book - This is Hubbard's book, Dianetics The Modern Science of Mental Health, published in May 1950. It has always been known as the first book.

[18] Bank - the reactive mind, the storehouse of all one's painful and negative memories.

[19] First dynamic - that part of one's life which has to do with self. One's name, identity, likes, dislikes, personality, and so on.

more Hubbard claims about Clear.

107. However, despite the claims, all Dianetic and Scientology auditing results are temporary, though emotionally fulfilling while they last. Clear is not a permanent state.

108. Clears find, to their chagrin, that they hurt again with similar hurts, upsets and problems they had before and they hope that OT 3 will fix them. When they are told that they are at risk until they do OT 3, attached hereto as **Exhibit 63**, they don't realize that OT 3 is Hubbard's excuse for his false claims about Clear.

109. It is only after the Clear completes OT 1 and 2 and pays for OT 3 that he can learn what OT 3 is.

110. When he reaches OT 3, he finds, usually to his shock and incredulity, that all his physical and psychosomatic problems are caused by BTs and not by engrams in his reactive mind, that every negative thought, problem and upset he has find their origins in the minds of BTs, not in his mind.

111. This is Hubbard's most insidious bait and switch. All the way to Clear, the person believes the cause of his upsets and problems was his reactive mind and engrams, and that he will be Clear forever. On OT 3, he suddenly learns that he paid $6,000 and $7,000 to find out he is infested with hundreds of thousands of BTs who are the cause of all his ills, and that he must learn to be an exorcist and talk telepathically to demons in order to reach OT 8. Attached hereto as **Exhibit 64**.

112. Throughout Hubbard's 1950 book, DMSMH, and later writings, Hubbard repeats that dianetic techniques are not hypnotic. Yet his dianetic auditing procedure from DMSMH clearly shows the

technique is hypnotic. Attached per **Exhibit 65**, pages 42 and 43, from the "HUBBARD DIANETICS SEMINAR" training pack "based on the works of L. Ron Hubbard."

113. Hubbard then wrote in his 1952 article, "Danger, Black Dianetics!" that, *"Hypnotism is a rather old and untrustworthy method of influencing or enslaving others. However, hypnotism is very unreliable ... The mechanisms of hypnotism ... are circumscribed in Black Dianetics ... Processing ... can undo Black Dianetics unless, of course, the victim has been driven into suicide or past the point of no return - a feat which is not difficult, but a condition which is not desirable where the operator seeks real advantage ... Several people are dead because of Black Dianetics ... Thousands may die because of Black Dianetics ..."* Attached hereto as **Exhibit 66**, pages 519 & 520. 112. Scientologists can't grasp these contradictions because their normal reality checks are 'disengaged.' This occurs in the constant application of repetitive and hypnotic techniques in Hubbard's auditing and business management techniques, and the resultant onset of trance states, the wide awake, intensely focused state in mental and physical creativity. Scientologists have to deny these contradictions in the face of incontrovertible evidence they are correct, because their existence revolves around the one person they trust completely, their authority figure, Hubbard.

114. The Scientology "Bridge"[20] is also a massive form of financial fraud. Even though the 'services,' the auditing and training, have been promoted for years as being "100% standard

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[20] Scientology "Bridge" - the step by step progress a Scientologist must take from his first auditing action or training course all the way up to Clear and then further up the "OT" levels.

tech," the same auditing action costs less at a subordinate organization and more at each successively higher level organization. The rationalization used for the price increase is that the higher level organization has better trained auditors, thus less flubs and faster delivery. Scientologists do not see the two sides of that coin .. and that it can't be both ways.

115. In my experience, which is not based on psychological expertise I claim but what I learned from mental health experts and from CSI, it is the bait and switch and the false claims about the techniques, including those on the OT levels, that cause so many upper level Scientologists physical and mental illness and even death.

116. That Hubbard ordered the OT materials to be kept strictly confidential under threat of immense punishment, becomes apparent when one reads them. The OT levels are confidential for the survival of Scientology, not for that of its parishioners. They are confidential because newer and less indoctrinated Scientologists would not believe them. If a Scientologist knew up front that on OT 3 he would, at great cost, enter a science fiction world and telepathically exorcise good and bad BTs for years, he might seek less costly and more conventional help elsewhere.

117. Scientologists argue that premature exposure to the OT level materials will cause anyone, including their parishioners, great physical harm and possibly death. What would really happen is that Scientologists would see Hubbard's doctrine for what it is - patently science fiction and not scientifically valid nor containing observable facts.

118. The OT materials have been in the public domain since the

late 1970s. I have never heard or seen reports of large numbers of deaths occurring coincident with the general public reading these materials in publications.

119. Hubbard spoon fed Scientologists level by level. There are books and materials on past lives, on out of body and mystical experiences and more, available but these are "teasers" and "mysteries" to keep Scientologists moving along. The big mysteries are the state of Clear and the OT levels.

120. In his "Professional Auditor's Bulletin" Number 66 of 25 November 1955, attached hereto as **Exhibit 67**, page 2, Hubbard said, "*The principle of Mystery is, of course, this: The only way anybody gets stuck to anything is by a mystery sandwich.*"

121. I also heard Hubbard say that, to keep a person on the Scientology path, feed him a mystery sandwich.

122. The Scientologists are entitled to any beliefs they wish. It is actually not their beliefs that is the issue. What is the issue is how they act.

123. It is CSI's practices, not their beliefs, that were the issue in the past and are still the issue now. For example, in this case it is CSI's practice of telling parishioners and staff members to end their lives so as to promote the greatest good for the greatest number of dynamics[21], telling parishioners to kill suppressive persons for the same reason according to "Fair Game," and orchestrating large financial frauds for the same reason and not

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[21] Dynamics - specifics areas of one's existence. 1st dynamic is oneself; 2nd dynamic is marriage, sex, children; 3rd dynamic is one's group or work; 4th dynamic is mankind; 5th dynamic are the animal and plant kingdoms; 6th dynamic is all matter, energy, space and time; 7th dynamic are all spirits; 8th dynamic is God or the Supreme Being.

religious beliefs that are the issue.

124. Hubbard's OT 3 materials are skimpy and bring up many questions. Some which I've tried to help OT 3 students resolve are: how do BTs stick to a person lifetime by lifetime if he has a different body each life? how can an electronic ribbon "catch" a body thetan? how are BTs packed into boxes and flown around in airplanes? how come BTs were implanted 75 million years ago on Hawaii and the Canary Islands when these islands did not exist at that time? I audited hundreds of Scientologists through such confusions to complete their indoctrination and accept the materials as valid.

125. I talked with many former Scientologists in the last eight years. The majority said they left CSI after getting onto OT 3 and reading the materials, or after getting onto higher OT levels and realizing they contained more BT exorcism techniques. I also talked with many former Scientologists who claim their physical and/or psychological problems started or worsened after getting onto OT 3.

CRIMINALS ACCUSE OTHERS OF DEEDS THEY HAVE DONE.

126. Miscavige writes in his 17 February 1994 declaration (attached herein) that "[Vaughn] Young has taken a personal tragedy in my family's life, the suicide of my mother-in-law, and attempted to make this an issue in this lawsuit by twisting it to imply non-existent wrongdoing in my past."

127. This is the criminal mind talking. Hubbard's bulletin of 15 September 1981, "CRIMINAL MIND," attached hereto as **Exhibit 68**, states, "*There is a datum of value in detecting overts*[22] *and*

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[22] Overt - a sin, transgression.

withholds[23] *in criminal individuals: THE CRIMINAL ACCUSES OTHERS OF THINGS WHICH HE HIMSELF IS DOING ... THE CRIMINAL ONLY SEES OTHERS AS HE HIMSELF IS."*

128. My husband and I have also experienced similar abuses by Miscavige and CSI, including multiple accusations of murder and other crimes which are not based on facts and of which we are not guilty.

129. Miscavige took a thirty year old personal tragedy in my family's life and twisted it to imply non-existent and criminal wrong doing on my part, as follows:

130. In early 1992, Miscavige, as RTC Chairman of the Board announced to a group of 700 Sea Org members that I murdered my father. He said this at a full staff meeting of the CSI International Headquarters in Gilman Hot Springs, Southern California. Three former high level Scientologists who recently defected, witnessed this. All three defecters told me that Miscavige said I was caught with my hand in the cookie jar and was, at that time, in prison in South Africa serving time for the crime. This is a complete falsehood and fabrication. Not one part of Miscavige's statement is true, except that my father was tragically murdered in 1964 in East London, South Africa, thirty years ago. My older brother, after a life time of incest perpetrated by my father on the children, confessed to the crime and was tried, convicted, sentenced, and served time. I was in Johannesburg at the time of my father's death and had nothing to do with it. Miscavige knows that.

131. CSI agents and P.I.s, including my former husband, Guy

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[23] Withholds - A Hubbardian word for sins or transgressions a person has committed and which he won't talk about.

Eltringham (a Scientologist living in Los Angeles), attempted to get the South African Police ("SAP") to re-open my father's murder investigation on the basis that I did it or was an accessory. My elderly and ailing invalid mother, and my brother and his family in Johannesburg, were terribly harassed, to the point of my mother shouting in fear at the 'investigators,' and my niece also screaming in fear at the strange men who came to her father's house late at night with invasive and harassing questions about her father's past. My husband and I had to retain a Johannesburg attorney to defend my family and myself from CSI's and RTC's horrendous "Fair Game" acts and spurious charges. Our Johannesburg lawyer concluded the Scientologists spent well over a year and a fortune on their investigation. However, the SAP recently said the matter is closed as there is no evidence of my complicity. I am awaiting formal notification to this end from them.

132. This has not stopped CSI from continuing with its "Fair Game" activities against us. Several days ago, Marcy McShane ("McShane"), the wife of OSA member Warren McShane, who worked for the GO, visited our home unannounced, asking to see Hana, myself. My husband answered the door. McShane proceeded to accuse us of deprogramming and hiding like criminals. She scolded my husband, saying that he had promised to stop giving radio interviews if, as McShane said, "We stopped the murder investigation on Hana in South Africa and stopped demonstrating outside your home." McShane was misinformed. My husband had never made such a promise to anyone at anytime, ever.

133. On 7 March 1994, an updated "dead agent[24]" dossier reached my husband and me from CSI. It contains additional information about my brother's court case and trial, testimony of witnesses and includes an affidavit reportedly written by a family member which recounts explicit sexual acts ... the document is pornographic. Furthermore, it has nothing to do with me. Additional information is also included about my husband.

134. The CSI's actions stem from **Hubbard's** policies and procedures which order the death of suppressive persons, their unending harassment with "manufactured" evidence if needed, and more.

135. Due to the years of unmitigating and shocking "Fair Game" harassment by CSI and RTC of my husband, myself and my family, I experienced overwhelming shock, emotional and physical distress which has caused frequent illness and inability to function and work.

136. The following excerpt of Hubbard's taped lecture, "Clearing Methodology" of 13 May 1959, reprinted in 1993 by the Church of Scientology Flag Service Organization in Clearwater, attached hereto as **Exhibit 69**, page 2, applies. It states, "*I won't call it privacy because that dignifies it. You have to be willing to invade privacy, very definitely ... when you realize that the highest point of aberration on the third dynamic was the first time you decided not to invade somebody's privacy ... you will see at once where this connects on 8-Cing[25] somebody into a service*

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[24] Dead agent - the act of blackening and discrediting an enemy's or perceived enemy's name.

[25] 8-Cing - getting someone to do an action regardless of objection or excuse.

zone[26]."

137. It is shocking that Miscavige and Jentzsch, who are protesting the fruits of their own law suit, the particulars which have come to light during its proceedings and their court ordered depositions, would protest their innocence while being guilty of acts to blacken critics' names such as those of Dr. Uwe Geertz, Fishman, Vaughn and Stacy Young and my husband and me.

PSYCHOTIC EPISODES, PTS TYPE III[27], SUICIDAL IDEATION AND SUICIDE INDUCED BY AUDITING.

138. Raymond Mithoff ("Mithoff"), Senior Case Supervisor Int., writes in his February 16, 1994 declaration attached herein, "I can ... state that there is no special terminology in Scientology Church scripture for suicide. Suicide is regarded, in church scripture, as an aberration, and any person who has suicidal tendencies is a person who needs help." Mithoff doesn't specify what help is given to Scientologists with suicidal tendencies and who are PTS Type III. Due to my auditor training and experience, I was privy to information about suicides and PTS Type 3s, as was Mithoff, that most Scientologists aren't, so I understand his reluctance in elaborating on these points.

139. Hubbard redefined or repositioned mental health terms, including words like "suicide" in his own language and to his own ends. One example of the repositioning of "suicide" is contained in

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[26] Service zone - an area in a CSI organization where auditing or training, also known as "services" or "a service" are delivered to people.

[27] PTS Type III - a term devised by Hubbard to describe insanity or psychosis. When applied to a Scientologist, it means the person is irrational, hat he sees everyone around him as an enemy or "suppressive" and may be hallucinating and seeing persons and things that are not present in reality.

Hubbard's taped lecture of 3 January 1960 titled, "CREATE AND CONFRONT," attached hereto as **Exhibit 70**, pages 93 and 94. Hubbard said the Markab Confederation, a civilization that existed between 19,000 and 40,000 years ago, was so medically advanced that death was eliminated. People received body part replacements instead, ad infinitum. The one sure way to die was to do it oneself, massively, on a speedway or racetrack, which existed for that purpose. Hubbard said, "*And so before I used the track for the purpose it was intended, which was knocking off*[28] *a mock-up*[29]*, why, I'd get in there and ....*"

Another example is 'PTS Type 3' or 'PTS Type III', in Hubbard bulletin of 24 November 1965, "Search and Discovery," attached hereto as **Exhibit 71**, pages 701, 703 & 704. Hubbard said, "*Type III is beyond the facilities of organizations not equipped with hospitals as these are entirely psychotic ... Type 3 PTS is mostly in institutions or would be. In this case the apparent SP is spread all over the world ... for the person sometimes has ghosts about him or demons and they are just more apparent SPs but imaginary as beings as well. All institutional cases are PTSes. The whole of insanity is wrapped up on this one fact ...*" Hubbard's remedy - a safe environment, quiet, rest, no treatment of a mental nature at all, intravenous feeding if required, soporifics (narcotics, sedatives or tranquilizers).

140. According to Hubbard, psychosis, insanity and PTS Type 3 are one and the same.

141. Based on my Scientology experience and what I have learnt

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[28] Knocking off - killing, destroying. A euphemism for suicide.

[29] Mock-up - an imaginary picture in the mind.

from psychology experts, Hubbard's aim in auditing was to push the preclear into his past, make him believe what he found, then push him into his youth ... then his birth experience ... and then ... past lives ... all the while believing that what he sees in his mind is as real as what he sees with his eyes in the material world. In so doing, Hubbard successfully collapsed the factual boundaries between objective and subjective reality.

142. Scientologists will adamantly deny this and as adamantly declare that contacting and auditing their past lives and believing what they find, is voluntary. But Hubbard's books, tapes and all Scientology and Dianetic techniques and literature are replete with past lives and mystical experiences.

143. The OT levels are the ultimate past life. One audits not just one's own past lives but those of hundreds of thousands of BTs as well. One runs into mass kidnappings, betrayals, exploding volcanoes, decimation of civilizations, mass implanting of body thetans, evil rulers, electronic mountain traps, heroes, earlier universes, parallel universes, between lives implants, the beginning of the cosmos, and more.

144. Many Scientologists have difficulty determining whether their past lives are real or imaginary. Hubbard's 24 November 1965 bulletin, "Search and Discovery" attached hereto as **Exhibit 71**, states that the ghosts and demons seen by institutionalized persons are imaginary. But his OT 5 materials state that BTs (who Hubbard said are real) can take on the identity of a ghost or a demon. Attached hereto as **Exhibit 72**, Bulletin of 17 September 1978, NED for OT Series 6, page 3, "*A BT or cluster can go into the valence of a person ... BTs and clusters thinking they are the person ... This*

is discussed under the heading of "Ghosts" ... Nearly everybody has a ghost if he looks ... "
In answer, therefore, to how one will know whether past lives and BTs and clusters are real or not, Hubbard's sole answer is that one will know. As Hubbard is the absolute authority figure, Scientologists' answers are that they will know.

145. One question arises - what happens to people who live in a fantasy world which becomes more real to them than the physical or material universe? In which objective reality has become subjective reality, and vice versa? This could be said to happen to people in institutions. This is what happens with every practicing and dedicated Scientologist who starts into auditing and continues on with it.

146. A fundamental Hubbard doctrine is the "overt motivator sequence[30]." It meant that I, and I alone, was responsible for my upsets and problems. It wasn't Hubbard, or the organization, or his techniques ... and never could be. A Scientologist's acceptance of this and other Hubbard's doctrines and policies, assisted the Scientologist in accepting the validity of his subjective reality almost over that of his objective reality.

147. An example of this occurred in the early 1980s at the HQ in Clearwater, Florida. A painter from New York was at the HQ getting auditing. While he was in session one day, his small child, under the supervision of a nanny, fell into the pool in the garden

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[30] Overt motivator sequence - if Bill does a bad deed to Tom, Bill feels that, (a) something bad will happen to him, or (b) that something bad was already done to him and therefore the bad deed he did to Tom was justified.

and drowned. The painter was told about the tragedy after his session. He was shattered. Instead of an investigation being held into how and why the young child fell into the pool and why it was left there long enough to drown, the only action that was taken with any of the people involved, was to put the father back into an auditing session immediately. He was then audited on what sins or transgressions he had done that caused his young child to drown.

148. Based on my Scientology experience and what I learned from mental health experts, most Scientologists undergo vast personality changes. They are completely unaware of it, and will deny it and argue with great conviction against it. But the longer and stronger their adherence, and the more they are steeped in Hubbard's teachings, the deeper and more lasting the changes. Their normal thought patterns, reality checks, logical thought processes, responses and family values they were raised with, are all modified by Hubbard's teachings. They eventually become Hubbard's alter-ego, to the point of chain smoking (Hubbard had bad teeth, nicotine stained dark brown), screaming at subordinates as a routine ... and manufacturing evidence against SPs, inducing parishioners into insanity, holding people against their will, denying people professional treatment, ordering parishioners to kill SPs and themselves, and orchestrating large financial frauds.

149. Considering the numbers of Scientologists who were ill despite repeated 'PTS handlings,' those on whom the techniques did not work, those who had interminable case problems and who required extra auditing or the best auditors, and the tens of thousands who never took their next step, Hubbard's grandiose claims about Scientology are patently false.

150. The techniques, particularly the OT levels, and the drastic personality changes, are dangerous and harmful to the Scientology majority who apply them over long periods of time. They induce mental illness of many kinds, such as dissociative states, hallucinations, paranoias, suicidal ideation, all of which are considered normal within CSI ... and death. I have seen many Scientologists suffer, and live in pain, because of Hubbard's beliefs, but now their own, that auditing would 'handle' their physical or emotional or mental condition.

151. In forty four years, Scientology has produced only 50,000 Clears and 1,200 OT 8s, attached hereto as **Exhibit 73**. Yet CSI claims an active international membership of six to thirteen million. What happened to the rest?

152. CSI auditors are unlicensed practitioners who have no professional or academic credentials about the human mind.

153. The wanton waste of human life in CSI is horrifying.

MY MENTAL ILLNESS INDUCED BY OT AUDITING.

154. I had a devastating experience in CSI. I did well at first. But had great difficulty accepting the "BT" story on OT 3 and applying the techniques. I began "hearing voices" soon afterward, at first faintly and then increasingly.

155. From 1974 onward, I suffered from intense, continuous migraines - ironically brought on in auditing which was designed to remedy forever the occurrence of headaches. I ended up in pain twenty four hours a day, seven days a week, four weeks a month and twelve months a year thereafter.

156. Periodically the "voices" got worse. I felt split into hundreds of "me's", each arguing with the other. I got physically

and emotionally very debilitated. Because of Hubbard's doctrine, I felt I must have done something terrible in a past life to be in so much pain in the present. At times I thought I was going crazy.

157. But according to Hubbard's doctrine of the "overt motivator sequence," I, and I alone, was responsible for my pain. I was responsible for everything that happened to me. A burning question was ... if the doctrine was correct and applied to every Scientologist, how come the same doctrine didn't apply to to Hubbard and Scientology? Because Hubbard and Scientology were experiencing increasing quantities of problems internationally, year by year?

158. In my auditing sessions over the next seven years, I almost went crazy trying to find the cause of the pain - to no avail. Until early 1976, I received thousands of hours of daily auditing, with Hubbard as my case supervisor - to no effect.

159. I was often unable to work for two to three days each week due to the pain. I could not lie down because the pressure of the pillow or mattress on my head made the pain unbearable. It was all known to my auditors, case supervisors and Hubbard.

160. I finally realized that my only solution to stopping the pain was to end my life. I mentioned this in my auditing sessions repeatedly. In late 1977 in Clearwater, Florida, I was sent to a doctor for physical tests - with no result. This depressed me more. I searched for help in Hubbard's writings; I asked a few Class 12 auditors for any Hubbard bulletins, books or tape references that would help me. Paulette Cohen referred me to Hubbard's Expanded Dianetic taped lectures. I listened to all of them. The material referred to evil purposes, evil intentions and other things. But it didn't address my problems. I ended up more confused. I continued

getting regular sessions though Hubbard no longer did the case supervision. Sometimes my sessions went badly for weeks. A big square piece of red paper, a "red tag," was frequently pinned to the front cover of my pc folder. It denotes a failed session in which the preclear did not improve. Every time I saw the "red tag." I felt more guilty that I wasn't respond to Hubbard's techniques. This redoubled my efforts to find what was wrong. I was reduced to terrible, continual fear for my life and sanity.

161. I was also fearful that by REMAINING at the CSI HQ in Clearwater, my presence would harm Hubbard, his family and his goals. The only solution I could see was to leave, or die. I came very close to committing suicide several times. What held me back was the hope, always the hope, that the next session would bring relief. Sometimes I took up to 15 aspirin a day to alleviate the pain - it never did. I always told my auditors what I was thinking about, including how many times I nearly jumped from the top floor of the Clearwater building but refrained because it cause disrepute to Hubbard and CSI, how many times I almost broke into the Medical Officer's room to find relief for the pain, how I planned to run away and burn my ID (to prevent ill repute to Hubbard and Scientology) and kill myself.

The only things that prevented me from leaving Scientology earlier or killing myself, were my dedication to Hubbard and complete belief in him and my adamant unwillingness to bring ill repute to his name and his organization. This continued until I left the Clearwater HQ in March 1982 of my own accord.

162. I was never given licensed medical or mental health assistance, only that provided by Hubbard's Scientology techniques

which was inadequate for the task.

MY EXPERIENCE AUDITING OTHER SCIENTOLOGISTS WHO EXPERIENCED PSYCHOTIC EPISODES, PTS TYPE III EPISODES, DEVELOPED SUICIDAL IDEATION AND/OR COMMITTED SUICIDE.

163. During my twenty years in Scientology, I delivered thousands of hours of auditing to others, among them preclears with similar experience to mine and worse, and some who committed suicide.

164. In mid-1985 a high level Scientologist, Mary Florence Barnett, called Flo, phoned me. She was Miscavige's mother-in-law. I had left CSI the previous year. Flo cried on and off during the call. She complained of severe, constant pain in her head which nothing helped. According to her doctor, a recent head operation to repair an aneurism wasn't the cause, but he did not know what the cause was. Flo was very scared of the pain, and kept saying she wanted to kill herself to stop the suppressive BTs from taking over her mind. Both the Advanced Organization in Los Angeles ("AOLA") and the Clearwater HQ refused to audit her because she had no money to pay. Flo had been to the Advanced Ability Center ("AAC") once, a break-away former CSI group in Santa Barbara, and had good auditing there, but had no money to return.

165. Flo was very depressed after her daughter Shelley, Miscavige's wife, came to visit and ended up screaming at Flo. Flo said, in several of our phone talks, that neither Shelley or Miscavige cared a damn about her, and she was horrified into what monsters Scientology had turned her children. However, she promised to call Shelley again and ask for help.

166. I was deeply concerned about Flo's condition, but felt

incapable of helping her as I doubted the effectiveness of auditing. I spoke with Camille, another daughter living with Flo, who said her mother refused to see the doctor because he hadn't helped her and said her condition wasn't serious. Camille said her sister Shelley and brother-in-law Miscavige knew about their mother's condition but refused to see her or have anything to do with her because, they said, Flo was making herself ill, refusing to see the doctor, and was "down stat[31].

167. Over the next few weeks Flo called me and I called her many times. We spoke frequently, sometimes for hours. On occasion Flo begged me to get rid of the suppressive BTs that were killing her; at others she refused auditing because, as she said, "That's what messed me up in the first place." I spent a lot of time listening to her and letting her talk - she had a lot of fears and hurts. She cried a lot on the phone. She was in constant pain, unable to eat or sleep, and wanted to die or kill herself. She was very scared of the "things" she was seeing and hearing. She often talked about the suppressive BTs, that they were torturing her and making her go crazy, that they were implanting bad things into her and that she had to make them stop or go away. She said she'd heard and seen the "things" for years, but "they" were strengthening their hold on her. Several times, Flo openly blamed CSI for her condition and spoke bitterly about how CSI messed her up in auditing, that Scientologists were callous and, now that she was out of money having given it all to CSI, no one cared about her enough to help,

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[31] Downstat - 'down statistic' or 'down statistics.' A Hubbard phrase for one or more production statistics showing a down trend on a graph. This means that production in a given area or by a given person is decreasing steadily over time, or is going down.

not even Shelley and Miscavige.

168. Camille verified that Flo had no money left and that was why CSI would not help her.

169. Two days after our last talk, Camille called and said Flo had shot herself. I was devastated.

170. Two days later, Camille called again. We talked about Flo. She said whereas she was grieving over Flo's death but relieved her pain was over, Shelley's response was cold and indifferent, and relieved the embarrassment was finally over. Camille asked Jerry and me to attend Flo's funeral which would be small and limited to family and close friends.

171. But the next day, Camille called again and asked us **not** to attend. She hoped we weren't hurt by her request, but Miscavige, Shelley and other CSI top executives had decided to be there after all because they felt it was a duty and "to put on a show." Therefore our presence, as former Scientologists, wasn't wanted and would cause tension. I was very cross and upset, because Flo's Scientology relatives had done absolutely nothing to help her, but were going to put on a show for her funeral. But I agreed, and we sent a large wreath and a card instead -- for Flo's sake. Later, Camille thanked us for understanding. That was the last I heard from Camille.

172. In his February 17, 1991 declaration, Miscavige wrote on page 1, attached herein, "My only association with this tragedy was to console my wife who was understandably emotionally traumatized and grief stricken." Camille gave me the completely contrary impression - that Miscavige's wife, Shelley, was uninterested in anything to do with Flo and greatly relieved that her embarrassing

mother was finally out of the picture.

173. It is improbable that Flo, in her debilitated physical and psychological condition, shot herself three times in her chest and once through her head with a rifle, leaving no powder burns or marks, according to the Forensic, case, investigator and coroner reports, attached hereto as **Exhibit 74**. Yet, by all reports, this is what she did.

174. Facts that lead me to strongly doubt Flo died like that are the following: (1) she received three rifle shots through her chest and one rifle shot through her temple; (2) there were no powder burns or marks at the gun shot sites; (3) her debilitated physical and psychological condition didn't permit her to hold the rifle far enough away to shoot herself four shots without leaving marks.

175. According to both Flo and Camille, Flo was an embarrassment to Miscavige and Shelley, as; (1) Shelley visited Flo only once during her lengthy illness, Miscavige never did; (2) Shelley ended her visit to Flo by screaming at her; (3) they never took any action to assist Flo; (4) they considered Flo PTS due to her connection to former high ranking CSI officials, David and Julie Mayo, whom CSI declared Suppressive Persons, and her antagonism toward CSI; (5) they considered Flo a "squirrel"[32] for receiving auditing from David and Julie Mayo.

176. However, Miscavige was also PTS because he was, " ... *connected to a person ... opposed to Scientology ...*" and was, " ... *intimately connected with persons (such as marital or familial ties)*

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[32] Squirrel - Hubbard's term for Scientlogists who alter CSI techniques and do off-beat practices not allowed by CSI.

of known antagonism to mental or spiritual treatment or Scientology." This per Hubbard's policy of 31 December 1978, "EDUCATING THE PTS," attached hereto as **Exhibit 75**, pages 425 & 426.

177. Therefore Miscavige could not remain Chairman of the Board, ASI, or hold any top command position according to Hubbard's 12 May 1972 policy, "PTS PERSONNEL AND FINANCE" attached hereto as **Exhibit 76**, because *"IT IS UNSHAKABLE POLICY HEREAFTER THAT NO PERSON WHO IS PTS OR CHRONICALLY ILL ... MAY BE ON FINANCE ... LINES OR IN TOP COMMAND POSTS ..."* (emphasis in the original). The only actions Miscavige could take were to get Flo back into CSI or disconnect from her completely.

178. I have seen two letters from Flo Barnett dated 28 September 1984, one addressed to David Mayo, attached hereto as, another to Julie Mayo, attached hereto as, who owned the Santa Barbara AAC, and a third note dated 7 May 1985 to Julie Mayo, all attached hereto as **Exhibit 77**. Knowing Flo's handwriting, I can verify that these three notes were written by Flo Barnett.

179. Quentin Hubbard, the oldest son of Hubbard and his third wife, Mary Sue, also committed suicide.

180. Hubbard wanted Quentin, a Class XII auditor and one of the highest trained, to take over his technical position when Hubbard died. Quentin didn't want to. His only wish was to become a pilot and fly. During the 1970s while we were aboard, I often saw him walking along the decks or passageways mimicking an airplane, with one or both arms outstretched, weaving from side to side as he walked and making engine sounds in his throat. He was never self conscious, but just smiled or laughed as he passed by and carried

right on 'being' a plane.

181. Quentin went AWOL from the ship twice in 1975 while we were on board the "Apollo" in the Caribbean. Both times, teams of crew were sent ashore to look for him.

182. At one of those times, I was standing on B Deck Aft with Hubbard, his wife Mary Sue, some Aides and the Ship's Captain, about fifteen of us, waiting for Quentin's return. It was night time, and cold. Hubbard was mad at Quentin. He muttered under his breath on and off how much trouble Quentin was causing and the time he was wasting. Several times Hubbard ordered specific penalties to be assigned to Quentin after his return. Mary Sue was distraught and worried sick about her son. When Quentin finally returned, he was quiet and looked exhausted. Late that night, I heard Hubbard shouting in his B Deck cabin.

183. In 1976, after we moved to the Scientology HQ in Clearwater, Florida, I rarely saw Quentin as I was a senior executive and he was an auditor.

184. In late October or early November, 1976 in Clearwater, a GO staff member briefed us that on 28 October that year, Quentin was found unconscious in his car outside Las Vegas and was hospitalized. About two weeks later we learned he was dead. A few days after that, we heard that Mary Sue ordered three autopsies done, and the third located the cause of Quentin's death; he was suffering from a rare disease. We weren't told its name. I and others I knew, questioned why we were not given more information about how Quentin was found, hospitalized and how he died.

185. Many years later, I saw the Coroner's report and the Report of Investigation, both attached hereto as **Exhibit 78**, and I

read that Quentin had a possible cerebral abscess when he died, but no trace of carbon monoxide toxicity. Attached as **Exhibit 79**, are the November 23, 1976, St. Petersburg Times and Tampa Tribune, and the November 25, 1976 St. Petersburg times news releases of Quentin's death.

186. Another crew member who committed suicide was Susan Meister. I was on board the "Apollo" in mid-1971 when she allegedly shot herself. The ship was in Moroccan waters. Hubbard was aboard.

187. Susan was on board about six months. She was "PTS" - her family was upset because the ship's location was confidential and they did not know where she was.

188. In mid 1971, in my office on A Deck, I heard a strange, sharp sound. It was traced to the aft bridge cabins where the senior Ship's Officers berthed, and specifically to that of Chief Officer Amos Jessup. Susan was found, shot, lying on the bunk in Amos' cabin. I helped Mary Sue Hubbard, who was in charge of the GO, to investigate the death. Mary Sue checked the aft bridge cabin where Susan died. I checked Susan's bunk below decks and her possessions, but found nothing amiss. Mary Sue had already removed Susan's letters, note books and other personal effects. I arranged for someone to send Susan's clothes to her family. We interviewed Amos Jessup, who was visibly upset and shaking on and off. He blamed himself, as Susan wanted a committed relation-ship and he didn't. Susan was in the cabin alone after he went to work. He didn't see her alive again. He had no idea she was suicidal.

189. We interviewed a deck hand who was working on A deck port side, aft of the bridge cabin, when the shot occurred. He reported the sound and located Amos. We interviewed Susan's superior, the

ship's medical officer and several other people. They all said Susan was emotionally unstable. Mary Sue wrote a report for the Moroccan police.

190. Scott Leland, a good friend of mine, also committed suicide. I met Scott in 1965 in England. We went through several courses together including the Class Seven Auditor Training Course and the Clearing Course.

191. Afterward, Scott moved to Denmark, married and raised a family. He went through all the OT levels up to OT 6.

192. I did not meet him again until 1986, when out of the blue, he stopped to see my husband and me enroute to the Santa Barbara AAC for auditing. He did not look well. He cried several times over the next few days, telling me he'd been crazy for fifteen years and that the trouble started after he went Clear. When he started auditing on OT 3, he began hearing and seeing things and this gradually worsened to where he thought he was going nuts. He pleaded for help, saying he had no money for auditing at the AAC. I was very concerned and scared over Scott's condition.

193. The AAC said Scott could return at no charge, or if he wished, he could go to someone else and the AAC would provide case supervised instructions free of charge. Scott never acted on the offers.

194. Scott stayed with my husband and me for two weeks -- we fed and housed him. Scott mainly slept, ate, took long walks and read books. He looked and sounded much better when he left. He went to the US East Coast to see his mother before returning to his family, his wife and two young sons, in Denmark. I didn't hear from him again.

195. In 1987 I heard Scott hanged himself in his mother's house on the East Coast.

196. Another suicide occurred during the late 1970s while I was in Clearwater. A well known Scientologist at the Clearwater HQ was auditing her BTs and clusters. She drowned herself in the ocean off Clearwater Beach one night. Her death was declared a suicide. Reportedly no one knew she was suicidal. I don't remember her name. Her suicide was very hushed up by Scientology top command in Clearwater.

197. Other suicides which I know of are the following:

(a) Larrayne Johnston: She committed suicide in the mid to late 1980s by throwing herself off a bridge into freeway traffic in Los Angeles. She did this because Scientology would not help her after it alienated her from her husband and family.

(b) Rodney G. Rimando: He was a Scientologist from San Jose, California. He joined the Sea Org in Los Angeles in January 1986. He committed suicide by "falling" out of a window. Police were given a note by Church of Scientology officials which proved to be forged.

FURTHER SCIENTOLOGY VICTIM OF CANCER, as well as KIDNAPPING.

198. Roxanne Friend, a Scientologist, contracted cancer in the late 1980s. She was getting auditing for her condition at the Clearwater HQ, but was not doing well and repeatedly requested approval to see a doctor. Her requests were not granted. She was told continue on with her auditing. Finally, Roxanne left without approval and went back home to San Diego for medical treatment for her condition. In the early 1990s, her brother, according to his deposition in which he reports the following, and also a Scientologist got an RV, and with some of his friends, captured

Roxanne, drugged her and drove her back to Florida, with Roxanne druggily protesting on and off all the way. The Scientologists/Sea Org members in Clearwater held Roxanne captive in their Clearwater complex for several months, against her will. She was finally able to get away and back to San Diego. Roxanne's illness has advanced since then. She still lives in San Diego and still wants to take action against CSI, and, if her current strength continues, feels she may be able to do something in that direction.

SCIENTOLOGISTS WHO ATTEMPTED SUICIDES.

199. Some attempted suicides that I know of:

(a) Jim Hester was a preclear at the Miami Org in the mid to late 1970s. He attempted suicide in Miami and was then hospitalized in critical condition. He left a suicide note blaming Scientology, attached hereto in **Exhibit 80**, a copy of a GO report.

(b) Leah Theriery. She attempted suicide sometime in May 1974, attached hereto in **Exhibit 81**, a copy of a GO report.

(c) A friend of Gerald Simon's who was a Scientologist, attempted suicide by drinking a full can of RAID insect killer because he had been ordered to disconnect from his girlfriend.

200. I saw many Scientologists and Sea Org members go crazy and/or suicidal, like myself, while getting auditing.

201. During the early 1970s on board the "Apollo," I was Commodore's Staff Aide One, a position with international responsibility. Hubbard was my direct superior. A visiting Scientologist, auditing on the OT 3 level, went crazy, shouting, screaming, moaning incessantly and throwing himself around. I saw Hubbard give orders as to his care; he was to be confined in an aft cabin where his screams would not disturb top or middle management

working in the fore and mid sections of the Apollo; three strong men were to guard him twenty-four hours a day, in eight hour shifts, until he was sane; he was to get three meals daily whether he ate them or not; his captors were to maintain complete silence around him at all times whether he spoke or not; Hubbard was the only person who could communicate with the man and he did so by writing notes; the captors were to have sufficient "cal-mag" (a Calcium magnesium drink of Hubbard's own recipe and reportedly conducive to relaxation and sleep) on hand for the man to drink if he wanted it.

202. Hubbard personally supervised the man's "case handling" during his imprisonment. He wrote the man daily. Responses, when they started, were brought directly to Hubbard. The man was given some medication, prescribed by Hubbard, but I don't know what. The man almost got away from the guard once and was forced back into the cabin and tied to his bunk. He was held captive for over two weeks. He gradually calmed down, was released into the shipboard community, got some auditing and finally returned to the USA.

203. At no time was he seen or treated by a qualified medical doctor. Hubbard's directives on handling the man were later used as a guide for similar cases.

204. During the early 1970s, Bruce Welsch, a crew member on board the "Apollo" went crazy, or Type 3 PTS. He was locked up in a port aft cabin by Stuart Moreau and Ron Anderson, two ship crew members. I was in the aft area a few days later on some work assignment and I could hear Bruce making almost animal type sounds. They were terrible, inhuman sounds. And I could hear what I thought could be chains rattling. I was not around when Bruce recovered. Attached hereto as **Exhibit 82**, page 2.

205. In 1980 I was auditing at the Clearwater Organization HQ in Florida. A young woman, who was receiving Life Repair auditing from another auditor, began hearing "voices" talking to her.

206. She was reassigned to continue her auditing with me. The voices really scared her; she couldn't think of anything but the terrible things they said to her and told her to do.

207. From then on, the hundreds of hours of auditing I gave her were directed, by the Case Supervisor and the Senior Case Supervisor, at resolving the "voices." To no avail. She was transferred to yet another auditor, and then finally went home. I never knew what happened to her.

208. In 1966, I audited a nine year old girl at Saint Hill Manor, England, simple locational processes. During the session, she became violent, screaming and shrieking abusively as she kicked and bit my hands and arms. She flung herself against the furniture and onto the floor, spat at me and gagged a few times with her eyes rolling. I tried to hold her, gently yet firmly, so she didn't hurt herself, but she kicked and bit me and screamed all the more. I was scared. I continued the session as long as I could, because Hubbard's doctrine ordered, "What turns it on will turn it off." As soon as the girl was quieter, I ended the session and got John McMaster, the Qualifications Secretary,[33] to advise how to continue.

209. 194. The family returned to Scotland though - young girl got no further auditing. John told me that her parents were happy with her auditing results. I never knew how she was thereafter.

210. In 1969 or 1970, while I was Deputy Commodore for the

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[33] Qualifications Secretary - the head of the Quality Control division of a CSI organization.

United States and stationed in Los Angeles, a young man in his mid to late twenties, was auditing on OT 3 at AOLA. He went "crazy" in session one day. He was incoherent, screaming and hallucinating, seeing "things" on the wall and on himself. At times he was violent and kicked the walls and threw himself around.

211. The AOLA staff locked him up in a 2nd floor auditing room at the back of their building. Sheets, mattress and a pillow were put in the room. Everything else was removed so that he could not harm himself.

212. He never received medical help. We did not know or trust any medical doctors enough to let one in on the flap. The man was fed and held captive in the room under twenty four hour guard. I don't remember how his bathroom trips were arranged.

213. I saw him three weeks after he was "sane. He apologized over and over for the trouble.

214. I reassured him as best I could. I was incredibly relieved he was alright. He left shortly thereafter and returned to his home elsewhere in California. I never saw him or heard of him again.

215. I also had contact with many former Scientologists who were suicidal. Larry lived with his wife in Washington State. They were long term Scientologists. In 1986 or 1987, he arrived unannounced at our home in Los Angeles. In rambling, disconnected sentences, he told my husband and me that he left Seattle in order to kill himself, he had thought about it for a long time, his wife did not know where he was and he did not want her to know. He said his business and marriage failed, his Scientology gains had disappeared, the more auditing he received, the worse he got, and it

was all his fault. He was confused and scared. He said that when he reached Los Angeles he remembered where we lived and came for help. My husband and I were both shocked at his condition and very concerned for his safety. Larry stayed with us for several weeks in our home. We fed and clothed him.

216. He spent the first two weeks sleeping and eating. He read and watched TV a lot. We talked often. He got better. We encouraged him to see a licensed counsellor or therapist for help, but he refused.

217. After three weeks, I got Larry to call his wife to let her know where he was, that he was safe and would be home soon. They spoke a long time. From then on, they talked regularly by phone. He and his wife now live in another state and are happy and doing well.

218. Larry was fortunate. I wish there were more who recovered like he did.

219. David Voorhees lives in Washington State. In 1982 or 1983, he had a similar experience in Los Angeles. He was auditing on the OT levels and experiencing great difficulty. He could not apply the materials to himself yet knew that he had to. He went crazy trying to audit the BTs and clusters. He was held captive in a room somewhere in Los Angeles for weeks and injected with Thorazine injections by his captors to calm him. In his more lucid moments, David was told by his captors that he was getting Vitamin B injections. Attached hereto as **Exhibit 83**.

Another suicidal person was former Sea Org member, Ethel Budd

Miller. Sometime in the mid to late 1970s, she wrote an SO1 letter[34] which could have been a veiled suicide threat, attached hereto as **Exhibit 84**, a copy of a GO report.

220. Even today, Scientologists are still going crazy while applying Hubbard's auditing techniques. A recent expose from an English newspaper reveals shocking instances of Scientologists going crazy and being imprisoned at or near the Saint Hill Manor CSI headquarters in East Sussex, attached hereto as **Exhibit 85**.

DEATHS OF SCIENTOLOGISTS.

221. Lori Wood, the daughter of long term Scientologists, Peter and Doran Greene, was also a Scientologist and Sea Org member. She served with me aboard the "Avon River" in the Mediterranean when I captained the ship. Lori was at the Scientology/Sea Org Clearwater HQ in 1978 or 1979, while I was there. She was receiving auditing on OT 5 (which exorcised more BTs and clusters), or "NOTS" as it was then called. She got quite ill at one point during her auditing and was sent to the Ethics Officer. For some reason that I do not know, the ethics matter, if it fact there was anything incorrect she was involved in regarding ethics matters, escalated and kept on escalating. I asked at one point what was going on but could not get an answer. A short while later, without recovering from the illness, Lori died. What upset me so terribly about her death was that: (a) she was a good Scientologist; (b) she was in the middle of an auditing program; (c) she was being harassed by the Ethics Officer, Rae Matheson ("Matheson"), while she was ill, which is

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[34] SO1 letter - "Standing Order Number 1." This was a standing order of Hubbard's. It said, "All mail received by me shall be read by me." Reportedly, Hubbard read and personally replied to all mail sent to him - in fact, he had an "SO1" unit which did all the work for him.

unpardonable, and while she was getting physically worse. Her mother told me that when she, Doran Greene, challenged Matheson as to why he ordered the attack on Lori when she was in the middle of an auditing program as well as being ill, Matheson shrugged and huffed and said, "Where is that in writing?" Matheson's statement, though referring to a basic law of Hubbard's, "If it isn't in writing, it isn't true," never-the-less showed a characteristic Scientology attitude toward anyone who was in trouble or ill, who was making mistakes, or not making the expected progress in his auditing or training - it was the person's fault, it was always the person's fault, never that of Hubbard, his policy, his techniques or his organization ... never. The policy referred to is titled, "ORDER BOARD AND TIME MACHINE[35]," attached hereto as **Exhibit 86**, which states, "*In Scientology if it is not written it is not true. That's a major policy. It applies to all. Every order an Executive issues must be in writing.*"

MANY SCIENTOLOGISTS WHO DIE FROM CANCER ARE GETTING ONTO AND AUDITING ON THE OT LEVELS.

222. I have known many Scientologists and Sea Org members who died from cancer. The common denominator among them is that they did not seek medical assistance rapidly, when they first noticed something wrong. The overwhelming belief among Scientologists and Sea Org members was to get audited or continue on with auditing (if they were already receiving auditing) with the conviction that

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[35] Time Machine - a series of folders, one for each day of the week or month. Orders sent to one's subordinates can be placed in the folders according to the day on which the orders are to be complete. When the "completion" day arrives, the orders placed into that folder can be checked for compliance. The Scientology the time machine consists of a series of seven baskets only.

auditing would resolve the cancer.

223. In Hubbard's 1975 edition of his book, History of Man, Hubbard wrote on page 20, *"Cancer has been eradicated by auditing out conception and mitosis."* Attached hereto as **Exhibit 87**. This, and similar claims for other illness in Hubbard's DMSMH, may have helped to bring about the disregard for the medical doctor. In the recent edition of the same Hubbard book, History of Man, which, ironically occurred after Hubbard's death, a rewrite of the statement above occurs, saying, *"Cancer has reportedly (emphasis added) been eradicated by auditing out conception and mitosis."* There is no accompanying statement in the recent edition of the book saying that Hubbard authorized the change prior to his death, which he would have had to do for the change to be valid.

224. A friend of mine, Yvonne Jentzsch, died of a brain tumor. In early August 1967 I joined Hubbard's Sea Project in Las Palmas, Canary Islands. Yvonne was already on the ship and we got to know each other well.

225. In 1969 and 1970, while I was stationed in Los Angeles as Deputy Commodore U.S., Yvonne was the Commanding Officer of the first Los Angeles Celebrity Center. We met frequently in a work capacity as well as socially.

226. During the early to mid-1970s, I flew to Los Angeles on assignment several times and met Yvonne.

227. During 1977 we exchanged letters. Her's were shorter than usual, just brief notes. I noticed the change as Yvonne was known for her lengthy letters. She said she was tired, losing weight and getting headaches, all unusual for her. I didn't think much about the last; I also had constant headaches.

228. In late 1977, Yvonne suddenly arrived in Clearwater, very ill. She talked with difficulty, lost track of what she said half way through a sentence and lost her balance while walking. Yvonne told me she had a brain tumor and that she was dying. She said she hadn't seen a doctor because she thought auditing would fix it. The illness started with an "out of balance" feeling which she assigned to lack of sleep. The doctor told Yvonne the tumor was removable if she had seen him earlier. We both cried. I knew auditing did not resolve everything, but I was shocked that her life was wasted through such neglect.

229. She said that Hubbard ordered her to Florida for auditing to ease the transition, meaning death, as well as to do an end of cycle[36] on her "hats"[37] so that someone else could take over her Celebrity Centers after she "dropped her body"[38]. One day she cried and blamed herself for the terrible overt[39] of dying and deserting Hubbard. She was in continual pain but wouldn't take pain killers so that she could get auditing. On a later occasion, Yvonne was quite philosophical about her forthcoming death and said she was phasing out of her life and no one should grieve. I knew at that point that Yvonne had had auditing on her nearing death and that, in Scientologese, she had discharged any fear or trauma connected to it. Now I see that what occurred, as with all other auditing, was

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[36] End of cycle - a finite stop. (The definition comes from Hubbard taped lecture #5311CM24)

[37] Hats - Hubbard's term for the positions one holds and for job descriptions.

[38] Dropped the body - Hubbard's term for death.

[39] Overt - Hubbard's term for transgression or sin.

that Yvonne's reactions to death were temporarily desensitized, according to what I have learned from mental health authorities.

230. Over the next few weeks Yvonne's condition deteriorated rapidly. One day when we were outside, she spoke with increasing difficulty and went unconscious several times for short periods. It took us a long time to get up the stairs from the garden to the building Lobby, even with my help, because she could not coordinate her leg movements. She never received medical treatment of any kind that I know of.

231. Yvonne died in early 1978. No one I know of, except her family, was informed about her death for days or about funeral service. Nor were her close friends, such as I, given an opportunity to do a proper closure with Yvonne. We had a short briefing in which we were told that Yvonne had dropped her body happily and was in good case shape to pick up the next one, and that as this was a happy occasion, there was to be no time wasted in unnecessary grieving. Those most affected were only given auditing sessions.

232. Hubbard, in a published memo after her death, applauded Yvonne's achievements and granted her a leave of absence for twenty one years until she rejoined the Sea Organization in her next reincarnation.

233. Another Sea Org member who died of cancer was Carol. She developed breast cancer after joining the Sea Org. She told me that she did not report it because she believed that auditing would cure it. She also did not want to bother anyone.

234. Carol never received medical treatment for the cancer. She never got regular PAP smears and mammograms.

235. In the late 1970s, after the cancer became terminal, Carol was hospitalized. Because I had an RN[40] degree, Cathy Heard, a GO staff member, assigned me to take Carol home to her parents in England to die there. Cathy said she could not die in Clearwater as it would be bad PR for Scientology and the Sea Org. 222. Carol looked terrible when I saw her. She had lost fifty pounds, was very weak and her mind was wandering. She pleaded to stay in Clearwater because she did not want to go back to her family. I told Cathy but the request was ignored.

236. The hospital nurses said Carol could not travel in her condition, particularly as she did not want to. Her xrays showed the cancer spread throughout her body into all major organs. Cathy instructed me to give the nurses a "shore story"[41] saying Carol's parents wanted her to visit them for years, that Carol had disobeyed them for years, that they were now demanding her return, and we had found out and were desperately trying to intercede before it was too late. After hearing the story, the nurses became very helpful.

237. Her parents were very happy to see Carol though shocked at her condition. The family doctor was so disgusted after I gave him the medical reports the next day, and that Carol travelled while critically ill, that he refused to talk to me thereafter. The parents were very grateful that I had helped Carol get home. I stayed in England with the family for a week. Carol slept most of the time - she was too weak to get out of bed.

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[40] RN - registered nurse.

[41] Shore story - a fabricated story, not necessarily truthful, designed to placate another. Hubbard included the tactic in his public relations policies as well as his policies on 'covert' handling of his enemies.

238. I then flew back to Clearwater and debriefed. I was deeply disturbed by the experience. Ironically, I was assigned a condition of "power" by Cathy and Liz for successfully handling a potentially dangerous and sensitive situation. Carol's death was not known about in Clearwater. For years afterward, I wondered if there was more to Carol's death than I knew. Because death is natural. It shouldn't be a "dangerous" or "sensitive" situation.

239. Sally Esterman (formerly Chaleff) was another Sea Org member who died of cancer in January 1987. She developed cervical cancer, which in 99% of cases is curable if caught early. Sally never received regular PAP smears or mammograms, and by the time she reported her condition, the cancer was terminal. She gradually weakened until she was unable to work.

240. Sally was put into a convalescent home near the Scientology Complex in Los Angeles. She was bed ridden, too weak to do anything, for over a year. The room she was in and her sheets, towels and night clothes, were filthy. She didn't have the strength to clean them. Sally had no visitors, not even her Scientology husband, Mitch, who worked nearby. He was mad at her, said she was lazy, that she allowed herself to get ill so as to shirk work.

241. Sally was left to die on her own. She was in terrible pain continually, with nothing to alleviate it. Dr. Gene Denk ("Denk"), a Scientologist physician, saw her occasionally. It was Denk who gave Hubbard's medical officers blank, signed prescription forms so Hubbard could get all the drugs he wanted. Denk still treats Scientologists and Sea Org members to this day. He told Sally one day that she was too far gone, and all that was left for her to do was die and that she better not mess that up. Fortunately, Sally

had a friend who was no longer in Scientology. "Anne" saw Sally, after learning where she was, for the first time after she contracted cancer, at which time Sally weighed only 60 lbs. "Anne" looked after her from that point on for four months until Sally died. "Anne" cleaned out Sally's room completely, got her medication for the pain, clean clothes and sheets and other necessities, including flowers for her room. Sally suffered her last days on her own, abandoned by Scientology. Not even her former husband, Ira Chaleff, was told she died. Her death was very hushed up. She did have one friend though.

242. Some years earlier, Sally's former husband, Ira Chaleff, who was a declared suppressive person, came to Los Angeles, demanding to see his 17 yr old son, Sky. When he was ignored, Ira demanded to see Heber Jentzsch, CSI President. Ira was told to see the Ethics Officer because of his SP declare. Ira got mad, flashed his Congressional I.D.card, and suddenly that he didn't have to see the Ethics Officer and got to see his son instead. He found Sky was way below grade average and suicidal. Even though Sky worked a regular schedule at the Scientology organization, he was denied all services because his father was an SP. Ira took the boy back to Washington with him ... Sky just recently graduated Magna Cum Laude in Computer Science, and is now a healthy young adult with his whole life ahead of him.

243. Susan Todhunter, a long term Scientologist, died of cancer recently in San Diego. She was an opera singer and a Scientology 'celebrity.' Her family wealth allowed her continual auditing. I audited her in Clearwater between 1979 and 1981 when I was a "case

cracking"[42] auditor. Later on she completed OT 7, the highest OT level which exorcises BTs and clusters. She developed cancer in the 1980s. Because of her wealth, Susan got auditing from top trained auditors at the Los Angeles Celebrity Center almost up to her death.

244. Marie Passmore was a long term Sea Org member, a Class 8 trained auditor, and on the OT levels exorcising her BTs and clusters. She developed cancer in the late 1970s or early 1980s, and then got auditing in Clearwater, as she told me, to cure her cancer. She was convinced that exorcising her BTs on OT 5 would cure her. When the cancer became terminal, she was sent to Europe to die. I never saw her again. Her death was hushed up.

245. Phoebe Mauerer was also a long term Sea Org member. She was a trained auditor, and was exorcising BTs and clusters on the OT levels. In her last years, she was stationed in Los Angeles and Scientology's secret HQ at Gilman Hot Springs in the Southern California desert.

246. Phoebe did not believe in doctors and never got regular PAP smears or mammograms. After she found she had cancer, she went to Mexico for treatments. She eventually died.

247. Jens Bogvad was also a long term Sea Org member. He was Executive Director Tokyo Scientology Org when he contracted cancer. He had studied and graduated many of Hubbard's management courses, including the Org Exec Course, the Flag Briefing Course, and others. He was also a Class 8 auditor and on the OT levels, exorcising his BTs and clusters. He was finally sent home to Europe to die. His wife, Jeannie, is now the Exec Dir of the Los Angeles Org, and has

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[42] Case cracking auditor - an auditor who is better trained and experienced to resolve the 'difficult' preclears or cases.

remarried.

248. Betty Filisky was another long term Scientologist. She was the first person to complete OT 5 after its release in 1978, and received a lot of Scientology publicity on her achievement.

249. Betty was already suffering from cancer when she completed OT 5, but she believed she was cured. She relapsed six months later and died. Her death was so hushed up that not even her former husband and one child, also Scientologists, knew. He found out by chance about Betty's funeral service in Texas, and so was able to attend.

250. Peggy Bankston was also a close friend of mine. She was an original Sea Project/Sea Org member, a class 6 trained auditor and a graduate of the upper level OT 3 auditing. Peggy was already on board the "Avon River" in Las Palmas, in early August 1967, when I arrived. Peggy held various positions on board, the main one being that of Flag Banking Officer and Hubbard's personal Finance Officer. She was very admired by Hubbard and he gave her a number of assignments to do which she always did well. Sometime in late 1967, she suddenly fell into disfavor with Hubbard, then got ill. Shortly thereafter, she left the ship, quietly and quickly. I was away at the time and never found out what occurred exactly. When I returned, I found Hubbard had written an ethics order about her, which shocked me, attached hereto as **Exhibit 88**. Several years later I found out Peggy had died of cancer. She was living somewhere on the West U.S. coast at the time. I was never able to find out whether she had cancer when she was in the Sea Org or not. She did have a large, darkened skin blemish her left cheek, about an inch in diameter, somewhat similar to a mole but much larger, which Hubbard

Hubbard verbally abused her about. For example, he said to her, "You have that thing on your face because of overts, you know that, don't you?" ... and ... "If you're an OT, why don't you get rid of that overt on your face?" ... and ... "You haven't told all yet!" Then he would laugh at her and walk away.

251. Daphne Parselle was in Scientology in the late 1960s, in London and Saint Hill, East Grinstead. She achieved the state of Clear in 1967. During her Clear speech, (Clears in those days gave a short speech about their 'wins and gains' in reaching the state) in the Chapel at Saint Hill Manor, she claimed, very positively and enthusiastically, that she was cured of the cancer because of her auditing. However, she died of the cancer shortly thereafter.

252. Ellen Carder was an American, and a Scientologist in the early 1960s. She had cancer. She went to England for advanced auditing. While there, she claimed that Hubbard told her that if she studied the Clearing Course and then applied the auditing techniques to herself to achieve the State of Clear, her cancer would be cured. Ellen started on the course of action. However she died in June 1966 at Victoria Hospital, East Grinstead, England - from the cancer.

253. A high level German Scientologist who came to Clearwater for upper level auditing on BTs and clusters, died one day in his room. The "PR story" was he slipped in his bathtub one day and died. I don't remember his name. His death was very hushed up by Scientology top command in Clearwater.

SCIENTOLOGISTS AND SEA ORG MEMBERS ARE OFTEN LOCKED UP AND HELD AGAINST THEIR WILL, SOMETIMES FOR MONTHS.

254. In May 1978, I was assigned to the Rehabilitation Project

Force ("RPF") in Clearwater, Florida, attached hereto as **Exhibit 89.** This is a Sea Org detention camp, a 'gulag,' to which are assigned Sea Org members who have (according to Hubbard's doctrine and policies) seriously erred or produced badly. My assignment was for being a failed executive and for not doing well on my job. In addition, aA recent auditor of mine reportedly saw a specific E-meter needle reaction occur during my session. It was called an R/S.[43] The R/S reportedly occurred while I was talking about Hubbard, his techniques or organizations, and that meant, again according to Hubbard, that I harbored bad intentions toward Hubbard, his techniques or organizations, and therefore, I was a bad person and required immediate isolation and "rehabilitation." I was commandeered off between two big Sea Org men, both already in the gulag, to the second floor garage of the Fort Harrison Hotel and locked up in solitary confinement for two or three days, in a small room, without windows and a mattress on the floor. I was devastated, in shock and numb ... (Needless to say, 18 months later, I was exonerated of the charges, as per **Exhibit 90.**)

255. It was common to treat Sea Org members this way, from top command to galley hands. And it was common for those assigned to the RPF, or gulag, to be locked up in solitary for one to several days or more until the person had 'calmed' down, come to his senses and realized he needed rehabilitation. He was then released into the arms of other inmates to do his 'time' and attend to his and

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[43] R/S - Rock Slam. A needle read which occurs on Hubbard's Scientology E-meter or electrometer, which is basically a skin galvanometer and measures heat and moisture changes in the skin. The person being audited holds a tin can in each hand through which the changes are detected according to questions asked the preclear and his responses. It is a cruder instrument than a lie detector which has additional monitors of breath and pulse.

others rehabilitation.

256. Some months later, also in 1978, a new person was assigned to the RPF, Lyn Froyland. She was to be my twin - meaning we were to help rehabilitate each other. I found out to my surprise that Lyn was a GO staff member from Los Angeles and on assignment to Washington, DC, and was sent from there to Clearwater. Customarily, GO staff weren't ever RPF'd with Sea Org members. I also rapidly learned that Lyn was devastated over something which occurred in Washington, D.C. She said something terrible was going on, Hubbard and GO policy was being completely violated. She tried to correct the situation, only to find herself removed from the assignment and in the gulag with no recourse. To rehabilitate herself, Lyn was expected to talk about her upsets and problems in her gulag auditing. But she would not. She maintained that she had been bonded many times and could not and would not reveal security and confidential information about her organization, the GO, her position or her assignment. Because of the continued refusal to cooperate, Lyn was rapidly assigned to the RPF's RPF. This was several steps down from the RPF, in the boiler room under the Ft. Harrison hotel building. It was a dark, filthy, smelly place where the huge boilers roared and clanked day and night and where the rats lived. Lyn was chained to a pipe down there for weeks, under guard. She was taken meals and allowed toilet breaks, but no other hygiene. I tried desperately to get her to repent and get out of the hole, but she would not. The longer she stayed in the hole, the less she spoke and the more unwilling, sullen, filthy and feral looking she became. I was stunned by what was happening to Lyn. Finally, she did the actions necessary to get out of the hole and back into the

RPF, though she was still under 24 hour guard. That night, Lyn somehow got away from the security guard ... and disappeared. I have not heard from her or about her since.

PROFESSED CONCERNS ABOUT PAST LIVES IS A RED HERRING BECAUSE A SCIENTOLOGIST'S BELIEF IN PAST LIVES IS WIDELY AND PUBLICALLY DISSEMINATED.

257. In his declaration, Mr. Moxon takes umbrage that CSI deponents might have to testify about their belief in past lives. (Moxon declaration, page 22)

258. There is nothing confidential or secret about past lives in Scientology, except for the OT levels. On the contrary, Hubbard himself wrote at least three publically available books which delve extensively into past lives. They are: (1) Mission Into Time which covers several of Hubbard's claimed past lives, attached hereto as **Exhibit 91**, including treasure he buried in those lives. The book summarizes a 1968 expedition led by Hubbard to Mediterranean countries to locate and dig up his treasure. I was the Captain of the "Avon River" on that expedition. (2) Have You Lived Before This Life, contains forty-one alleged auditing case histories of past lives, one of which supposedly occurred 23 billion years ago, attached hereto as **Exhibit 92**, page 238. (3) Scientology: History Of Man, written by Hubbard, states in the Forward: "*This is a cold-blooded and factual account of your last sixty trillion years,*" attached hereto as **Exhibit 93**. Hubbard continues: "*This is useful knowledge. With it the blind again see, the lame walk, the ill recover, the insane become sane and the sane become saner.*" The book contains Hubbard's perspective of the history of the human race and describes strange past lives which he claims every person

experienced from the beginning of time, including that of the Pilt Down man, later found to be a hoax. All three books are available in major bookstores as well as Public Libraries. They are sold to Scientologists in Organization bookstores, though at far higher prices than in retail stores.

259. Hubbard even developed a technique to resolve past life occlusion. In 1975 he wrote a bulletin, "PAST LIFE REMEDIES," attached herein as **Exhibit 94**. It states, "*There are many remedies and considerable tech developed over the years on the subject of pcs (preclears) unable to go earlier than this life ... The earliest was getting the pc to locate and run* *imaginary* *[emphasis added] incidents ... Delusion tends to run off but the* *real incidents* *[emphasis added] move into view as well.*" I ran this 'remedy' on many preclears with mixed results -- some preclears ended up believing they lived in the past and were the identity they found; many did not. I know of many other auditors who did so as well, also with mixed results. It was run on me many times with limited result.

260. Getting a Scientologist to believe that what he sees in his mind is valid, is achieved step by step. At first, the lower level grade auditing gets him looking into his mind for this life memories, which he knows are true. As he often also achieves emotional highs in remembering something, his belief that his memories are valid is enhanced. His next step, according to Hubbard, is Dianetic auditing. At this point he may or may not go into past lives. If he does, he more willingly accepts those memories as valid because he knows that the earlier ones were valid. And he will accept 'memories' of past lives including some

extraordinary and unbelievable ones. When he finally gets to OT 3 and learns that he has spiritual cooties all over him, and if he has been a true believer up to that point, he normally accepts that as well.

261. Despite the fact that Scientologists must believe in past lives and be able to audit them to reach the top of Hubbard's Bridge, the CSI attorneys have seen fit to attack the credibility of defendant, Steven Fishman, because he believes in past lives and has a belief he was Malchoot, or the father of Jesus Christ.

262. Fishman's belief is exactly the end result a preclear is expected to obtain during his Dianetic session, a belief that he lived as a particular identity some time in the past, often a famous one.

263. During the thousands of hours I audited others, a large number of my preclears remembered one or more of their past identities. About ten of my preclears believed they were Jesus Christ, about five believed they were Joan of Ark, four were convinced they lived as George Washington and one as Thomas Jefferson.

264. In 1968, I heard Hubbard say that who a preclear believed he was in a past life was unimportant. The importance lay in 'rehabilitating' the ability to recover past lives.

265. Most former Scientologists refuse to get mental health assistance for years because of Hubbard's belief that Mental Health professionals are destroying mankind and the world - that they are the cause of all illness, and familial, governmental, economic, educational, industrial and financial problems.

266. Regular PAP smears and mammograms are not provided in the

Sea Org, nor is routine dental care. Hubbard believed he was invulnerable - so do Scientologists.

267. Miscavige's attempts to discredit Vaughn and Stacy Young as CSI experts was expected. (Miscavige declaration, page 15) He can do no less. Hubbard insisted that his critics and enemies be discredited, their names blackened, their lives ruined and their deaths demanded. Miscavige, being a true believer, has to follow Hubbard's orders. The Youngs will more than likely, receive more harassment.

268. This does not alter the fact that anyone who has served and worked in CSI and the Sea Org as long as Vaughn and Stacy Young, who received the extensive training they have, and held the positions they have, is an expert on CSI and the Sea Org.

269. I am sure that in response to this declaration, the Scientologists will further discredit me and manufacture more disclosures about me in their continued "Fair Game" actions to blacken my name and ruin my life. I expect nothing less of them, as they are duty bound to follow Hubbard's directives on their perceived enemies.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Los Angeles, California this 8th day of March, 1994.

Hana Whitfield

Hana Whitfield

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES;

I am employed in the County of Los Angeles, state of California. I am over the age of eighteen (18) and not a party to the within action; my business address is: 221 North Figueroa Street, Suite 1200, Los Angeles, California 90012.

On March 10, 1994, I served the following document (s) described as: **REVISED DECLARATION OF HANA WHITFIELD RE MOTION FOR COSTS** on interested parties in this action by placing ___ the original X a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

( ) (BY TELECOPIER) I caused such document to be faxed to the addressee.

(x) **(BY MAIL)** I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at Los Angeles, California.

( ) (BY PERSONAL DELIVERY) I caused such envelope to be delivered by hand to the office of the addressee.

( ) (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(X) (FEDERAL) I declare that I am employed in the office of a member of this court at whose direction the service was made.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on this same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

(X) I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this declaration was executed on MARCH 10, 1984 at Los Angeles, California.

____
(Signature)

CHURCH OF SCIENTOLOGY INTERNATIONAL v. STEVEN FISHMAN, et al.
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EXHIBIT B

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex.

Central Orgs.
Franchise

HCO BULLETIN OF MAY 11, AD13

ROUTINE 3
HEAVEN

Well, I have been to Heaven.

And I've found that Scientologists have been to Heaven.

And that everybody has evidently been to Heaven.

The Goals Problem Mass implants, which are the apparent basic source of aberration and human travail, which begin with the goal To Forget, were cynically done "in Heaven".

For a long while, some people have been cross with me for my lack of co-operation in believing in a Christian Heaven, God and Christ. I have never said I didn't disbelieve in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants - if a bit more so.

Yes, I've been to Heaven. And so have you. And you have the pattern of its implants in the HCO Bulletin Line Plots. It was complete with gates, angels and plaster saints - and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again - until Scientology.

Before you went to Heaven you were not really very bad or very good, but you didn't think you had lived only once and you had a good memory and knew who you were and enjoyed life. Afterwards ---

The symbol of the crucified Christ is very apt indeed. It's the symbol of a thetan betrayed.

DATA

Additional work and possible corrections need to be done but this is the gist of the matter:

The implants are electronic in nature and follow the pattern of the G.P.M.

The implant station existed on the order of magnitude of 43,000,000,000,000 years ago. (The dates may be part of the implants but do not appear so at this time. However, a possibility of correction of dates is reserved).

Some have been through it once, some more than once.

The first time I arrived and the moment of the implant To Forget was dated at 43,891,832,611,177 years, 344 days, 10 hours, 20 minutes and 40 seconds from 10:02½ PM Daylight Greenwich Time May 9, 1963. The second series was dated to the moment of the implant To Forget as 42,681,459,477,315 years, 132 days, 18 hours, 20 minutes and 15 seconds from 11:02½ PM Daylight Greenwich Time May 9, 1963.

There are no earlier such implants. There are no later such implants.

I evidently have a goal of my own at 305 Trillion (U.S.) years and an actual GPM, all of which pulled into this 43 Trillion year implant.

ADDITIONAL E-METER DATA

Five goals in all may be common to both sequences. The first 3 of the 5 are the same. There are no implants as to time according to the meter. There are no numbers in any implants, but dates rocket read. Implanting was done on a non-visible thetan, but arrival was in a ship in a doll body according to the meter. Star of Bethlehem, Pearly Gates, The Way out of the Universe, all of which RR on the meter, give a clue to recruitment actions.

There was no purpose in giving a particular thetan a particular goal. Planning had no individualization.

A preclear's overts should be scouted as to why these implants keyed in, Fac 1, hypnotism, etc. But doubtful if any preclear did this type of implanting.

The mood is set that thetans are evil, treacherous and bad but this is all part of the implant, not factual.

The earliest point of the series is not known at this writing but possibly contains a recruitment through advertising. The departure method from the series is not fully known yet but probably just abandonment.

Contd...

The implants were not done in a box or in some trick manner of projection. The scenery is actually there, common Mest Universe space and matter and in the Mest Universe.

The first (43 Trillion) series consists of 29 implanted goals.

The second (42 Trillion) series consists of 21 implanted goals.

The first three goals in both series are the same, To Forget, To Remember and To Go Away. The last goal and one other in both series are the same. The remaining goals are not the same for the two implants.

PERSONALLY PERCEIVED DATA.

The pattern of RIs is different for the two series, consisting in the second series of added RIs below the To Have a Goal-ivity and with a different dwindling of adjectives and adverbs, but are otherwise similar.

Both series have the Gates of Heaven visible. The last implant of both consists of "entering" Heaven. The last goal of both is To Be In Heaven.

The gates of the first series are well done, well built. An avenue of statues of saints leads up to them. The gate pillars are surmounted by marble angels. The entering grounds are very well kept, laid out like Bush Gardens in Pasadena, so often seen in the movies. Aside from the implant boxes which lie across from each other on the walk there are other noises and sounds as though the saints are defending and berating. These are unimportant to the incident.

The second series, probably in the same place, shows what a trillion years of overt acts does (or is an additional trickery to collapse one's time). The place is shabby. The vegetation is gone. The pillars are scruffy. The saints have vanished. So have the Angels. A sign on one (the left as you "enter") says "This is Heaven". The right has a sign "Hell" with an arrow and inside the grounds one can see the excavations like archaeological diggings with raw terraces, that lead to "Hell". Plain wire fencing encloses the place. There is a sentry box beside and outside the right pillar. The road "leading up" to the gates is deeply eroded. An effigy of Joseph, complete with desert clothing, is seen approaching the gates (but not moving) leading a donkey which "carries" the original Madonna and child from "Bethlehem". The implanting boxes lie on either side of this "entering" path at path level.

These are the actual ends of the two series. One backs out the gates, of course, from top oppterm down, as this is the end. The last two RIs after this last goal say "it is the beginning", "Not the end".

The place, by implant and inference, was supposed to be in the sky like a floating island. Actually it was simply a high place in the mountains of a planet and the gates pathway falls away into a gorge, very eroded and bare by the time of the second implant, but heavily forested and rolling at the time of the first.

The beginnings have not at this writing been so well explored by myself. I have not viewed the second beginning (which says it is the end). However I do know that the second series was done in long square tunnels with the implant boxes, not unlike small P.A. speakers with fretwork fronts, on either side.

The first series actually begins with arrival in a "town" (as everything is backwards to upset the time sense). This "town" consisted of a trolley bus, some building fronts, sidewalks, train tracks, a boarding house, a bistro in a basement where there is a "bulletin board" well lighted, and a BANK BUILDING.

The bank is the key point of interest. It is interesting that we use the word "bank" (taken actually from computerology) to indicate the reactive mind.

This bank building was the on-the-corner old-fashioned granite-like construction, two or three stories high, with the door in the rounded front - even a revolving type door. Inside to the left of the entrance door is a rounded counter. Directly across the room are THE stairs.

The top oppterm and terminal of To Forget are at the top of these stairs. The implant then proceeds on down the stairs, step by step, terminals on one side (the left if one were coming up the stairs) the oppterms on the other. The first series (43 Trillion) has all its implant impulses at step level. In the second series the boxes are ear high to a man. By the time the gates are arrived at in the first series, the terminals are on the left as you approach the gates, the oppterms on the right, having been reversed at some point.

Contd...

The first (43 Trillion) series had very fine marble stairs. The same stairs can be seen in any big well kept railway station. They were complete with a white ball held in a wrought iron stand.

The thetan was taken along apparently on a pole trap to which he was stuck. It does not proceed step by step throughout the whole of the implant series, but after the first flight of stairs, goes a ways, stops while several pairs of RIs fire then goes to a new location.

The place seemed to have people in it. But they are all effigies. These seem radioactive. Contact with them hurts. No living beings are seen. But effigies that look like humans are performing sudden, repetitive actions with long halts between. In the "basement" such dummies are seen operating machinery.

The boarding house at the actual beginning has a dummy guest and a landlady in kimono and wrappers, reading a newspaper.

There are no devils or satans that I saw.

There is a passenger getting on the trolley bus, a "workman" halfway down the first stairs of "To Forget "eating lunch" and in To Be in Heaven a gardener or electrician adjusting an implant box behind a hedge and periodically leaping up and screaming.

The place, so long as the implants remain only partially discharged, seems to swim in white and black electronic masses, but these dissipate as the implants are run out by pattern.

One actually "enters" the "town" as the first action. The implants, however, were rigged to make the gates seem the entrance to the incident. One backs through from the town, into the bank, down the steps and eventually out the Pearly Gates, down the hillside and is there let off and abandoned. One might have had a body or its remains at the town but has none when abandoned.

"TO BE IN HEAVEN" is the last goal implanted in both series. The goal may be slightly differently worded in the second series.

This is not a body building implant, though running it gives somatics to chest.

This is not a GE implant. It is the person's own. Running it, particularly badly, brings it down on the body. There are body somatics on it, however, particularly eyes, face, chest, bones.

It apparently only can be run by 3M listing and Rocket Reads. One must have the goal to get the RIs.

CONCLUSIONS.

The place is so full of lies by implant that the preclear becomes quite confused and this review of the actual data is necessary to a successful navigation. However, it is very easy to read more treachery into it than there is in it - which is enough.

However, as the place existed so long it was in a varying state of repair and some change. (This data on time is subject to review). But in 1.2 Trillion years only some of the implant pattern and mock up had shifted. However, there may have been other stations. Only time and research will really tell that.

One must date the preclear's first (earliest) goal to forget, find how many times the preclear went through it, or some such implant station, date the other times and be careful to run only the first of the first series. As this is basic, as in Prepchecking, Sec Checking and old engram running, it tends to ease up the remainder of the implants. But running the implants later than basic is very much harder on the pc even though it can be done. Wherever one misses an RI in an early implant, that repeated RI when found in a later one tends to be very much more heavily charged.

Re-running any implant that has only been partially run tends to rough up the whole implant and make it hard to run.

LUCK

I think we are lucky. It could have been much worse. This Heavenly dream of destruction could have been current, not so long ago. It could have happened often, not just once or twice or three times per pc. But apparently it didn't and is unique in itself.

This is the core of the Reactive Mind. It is all the way South. For here, just once on the whole track, somebody discovered the mechanism of purposes and RIs

Contd....

and utilized them to install religious mania and pin thetans down to "one life" and planets.

The thing was done so well that it has hung up ever since. There are other implants, there are other goals and GPMs, but these are minor and easily found and listed once this key implant series is out of the way.

We were in a position of having an infinite number of pieces to the puzzle. Now we have a finite number which even though very tough are still finite in number. Further, every processing step taken, every RI discharged is a positive gain toward a definite finite result in processing.

Further, we have our hands on an apalling bit of technology where the world is concerned. With rapidity and a Meter it can be shown that Heaven is a false dream and that the old religion was based on a very painful lie, a cynical betrayal.

What does this do to any religious nature of Scientology? It strengthens it. New religions always overthrow the false gods of the old, they do something to better man. We can improve man. We can show the old gods false. And we can open up the universe as a happier place in which a spirit may dwell. What more can you expect? This actually places us far beyond any other beings that are about. It puts us, through increased beingness and a restoration of life, in control of much destiny.

We have now only a few unsolved problems about life, huge though they may be, such as the construction of bodies and how does one establish the character of and communicate, if feasible, with beings who are making trees and insects. There are a few things like these. But I imagine when we finally manage to communicate with beetles under rocks and free them, we'll no doubt find the Creator of Heaven who 43 + Trillion years ago designed and built the Pearly Gates and entrapped us all.

Good Lord, I'd hate to be guilty of that overt. But never mind - you aren't either. That guy is GONE (I hope!)

L. RON HUBBARD

(Note: This HCO Bulletin is based on over a thousand hours of research auditing, analyzing the facsimiles of the reactive mind, and with the help of a Mark V Electrometer. It is scientific research and is not in any way based upon the mere opinion of the researcher. This HCO Bulletin is not the result of the belief or beliefs of anyone. Scientology data reflects long, arduous and painstaking research over a period of some thirty years into the nature of Man, the mind, the human spirit and its relationship to the physical universe. The data and phenomena discovered in Scientology is common to all minds and all men and can be demonstrated on anyone. Truth does not require belief to be truth any more than water requires anyone's permission to run down hill. The data is itself and can be duplicated by any honest researcher or practitioner. We in Scientology seek freedom, the betterment of Man, and the happiness of the individual and this comprises our attitude toward the data found. The data, however, is simply itself, and exists whatever the opinion of anyone may be. The contents of this HCO Bulletin discover the apparent underlying impulses of religious zealotism and the source of the religious mania and insanity which terrorized Earth over the ages and has given religion the appearance of insanity. As the paper is written for my friends it has, of course, a semblance of irreverence).

(Note: All our data on the whole track remains factual and is not taken from any implant. The only error released earlier was the time factors involved in GPMs).

L. RON HUBBARD

LRH:jw
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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO BULLETIN OF 23 SEPTEMBER 1968

Class VIII

CONFIDENTIAL

RESISTIVE CASES
FORMER THERAPY

Hypnotism, "psycho" analysis, "pyschiatry" and other implant type therapies often key-in and jam the track.

These characters here, on any other planet and on the whole track dramatize implanting. The "therapy" involved would be a temporary relief brought by suggestion.

The wrong data of the "science" itself operates as a whole track lie. Getting well or able depends on establishing truth. These "scientific" lies are alterations of actual laws.

We often note electronics men have a rough case time. This traces to the lies Man uses for his "electrical science". As the subject is based on false assumptions, it itself tends to aberrate.

Therefore we get out of the road any former "therapy". We can rehab any moment of release in it, handle any overrun, et

We also do a new style Remedy B to get old therapies spotted and run back.

The only cases which hang up are
(1) Unaudited cases (lies about grades, etc)

(2) Drug cases (who seek in processing the delusion or madness which exhilarated them on drugs).

(3) Former therapy cases. (In this or past lives.)

(4) Out of valence cases.

(5) Cases who continue to commit overts on Scn.

(6) Case "audited" with their ruds or grades out.

(7) Seriously physically ill cases (where the illness makes too much PTP in PT).

Of all these the former therapy case is apt to be the roughest as any auditing session can be reactively mistaken for the "treatment". The next roughest is the drug case as a false exteriorization often occurs on an enforced basis and may go into restim.

Old therapies include the 2000 yr ago plus or minus Aoscuplepian drug treatment (hillabore) which produced a convulsion and coma and in which the nut practitioner made up as a God and "visited" the patient in a "dream". This outfit was all over the ancient world.

Also the Christian Church used (and uses) implanting (with a squirrel version of the "7s"). These gangsters were the Nicomidians from lower Egypt who were chased out for criminal practices (implanting officials). They took over the Niocene Creed before the year zero, invented Christ (who comes from the crucifixion in R6 75m years ago) and implanted their way to "power". The original Nicomidians date about 600 BC and people who were Christ data at 75 m years ago.

These were drug "therapies", actually implants.

Some drug takers go plowing back into early implants and drug therapies so the two get crossed up on a case.

To isolate the reason for a highly resistive case or high TA you can assess the above 7 items and get a clue. Don't limit it to this lifetime. And don't do it so as to key the person in hard on things he wasn't in. And don't do it unless the case is very hard to get a gain on.

Engram running of a crude sort can be found hundreds, thousands or billions of years ago and consists if it appears, of an overrun. They didn't know much about it and overran them badly.

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The trouble with such former "therapies" and electric shock, etc. it that it

(a) groups track by the command of the practitioner

(b) appears to be a grouped track because Body Thetans flash their pictures at the moment it happens and so makes multiple pictures and hides the real scene, or

(c) sends the pc to the start of track WAY back and sticks him there out of PT.

The keynote of piloting through messes like this is to A. Know what kind of a mess it is and B. Don't EVER force a pc back track or into anything he doesn't want to confront easily.

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One of these former therapy or drug messes is only hard to untangle because they are full of incredibles. The pc doesn't accept them or just try to see what's in them.

7887

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Anything eventually resolves if the pc just keeps on getting charge off.

The earliest charge is the most important.

Charge off the exact grades is the most valuable.

But ANY charge off will make it, even on former "therapies'

L. RON HUBBARD

LRH:jp:gn
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ORIGINAL

7888

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In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **DECLARATION OF DENNIS ERLICH IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 4/21/95 Time: 9:00 a.m. Dept: One Trial: 5/18/95

DECLARATION OF DENNIS ERLICH

I, Dennis Erlich, declare:

1. I am over the age of 18 years. I am a resident of the State of California. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto.

2. I was member of Scientology from 1968 to 1982. I studied and was extensively trained in all of the bulletins, policies, directives, other writings and taped lectures, of Scientology's founder and leader, L. Ron Hubbard, concerning his psychotherapy ("auditing") and the training of Scientology's psychotherapists ("auditors"). In 1977 I was posted personally by Hubbard as the Chief Cramming Officer, Flag, responsible for the training and correction of the highest level auditors, training supervisors and "case supervisors," those people who directed Scientology's auditing of its members, in the whole Scientology world.

3. During my time in Scientology I read and studied Hubbard's bulletins and other writings concerning Christ, Christianity and God. True and correct copies of two of his bulletins, "Routine 3 Heaven," dated May 11, 1963, and "Resistive Cases Former Therapy," dated September 23, 1968, are appended hereto as Exhibits A and B respectively.

4. These bulletins are consistent with Hubbard's other writings for indoctrinated Scientologists on the subjects of Christianity and God. Hubbard taught that the ideas of

Christ, Heaven and God are electronically installed "implants" in humans' minds by "implanters" at "implant stations" for the humans' enslavement. Hubbard also taught that only Scientology could remove these implants and rescue humans from this religious enslavement.

5. Inside Scientology at the organizational level in which I worked, it was accepted that anyone who believed in Jesus Christ or God, or who prayed to a Supreme Being was dramatizing an implant. Such a person was considered a "former therapy case" or "resistive case." He was not trusted in the organization, and as long as he remained, the efforts of his auditor and case supervisor were to destroy his belief in his religion, Christ or God. Such a person, if he continued his belief in Christ or God, was labelled "PTS Type III," Hubbard's designation for a "psychotic."

6. Hubbard and Scientology claimed to Scientologists and to people considering buying "services" that he had discovered and developed his psychotherapy techniques through scientific research and that the promises of Scientology auditing; e.g., increased IQ, cure of diseases and increased abilities, were scientifically proven and guaranteed. Scientology also claimed and claims in the media and in the legal arena, in order to avoid liability for not delivering on its promises, that the organization is a religion organized solely for religious purposes. Scientology claims as well that everything written by Hubbard about Scientology,

including its financial and management policies, its intelligence training policies, its "black propaganda" policies directing and calling for character assassination, its policies calling for the use of the law to harass, and its policies calling for antisocial and criminal acts against critics, including Hubbard's "fair game" policy, are religious scriptures.

7. Scientology claims that the "fair game" policy was canceled and its practices, which included theft, trickery, cheating, lying, suing and destroying labelled "enemies" has been discontinued. It hasn't. I have been "fair game" for years. Scientology has carried out a black propaganda campaign to destroy my reputation, it has stolen my property, and it has sued me. Scientology, as presently directed by its leaders, has no respect for civil rights and is utterly ruthless in its efforts to crush, through financial, public relations, legal and extra-legal means anyone its leaders perceive as threats to their goal of world wide power.

8. I am familiar with the information about Hubbard's misrepresentations about his past and his promises, and some of the noxious practices of Scientology, which was made public for the first time through the efforts of Gerry Armstrong, particularly during his trial in 1984 before Los Angeles Superior Court Judge Paul Breckenridge. This information was important in my becoming free from Scientology's mind control, and I know it has been important for many others as well. I

am also familiar with Scientology's efforts to destroy Armstrong's credibility so he and his information would not be believed, and to silence him through the courts so that the organization could say whatever it wants about him without his being able to respond. This is what fair game is all about. It would be a black day for people of good will and free minds everywhere if Scientology is successful in these efforts.

I declare under the penalty of perjury under the laws of the California that the foregoing is true and correct.

Executed in GLENDALE, California this 6TH day of APRIL, 1995.

Dennis Erlich

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex.

7893

Central Orgs.
Franchise

HCO BULLETIN OF MAY 11, AD13

ROUTINE 3
HEAVEN

Well, I have been to Heaven.

And I've found that Scientologists have been to Heaven.

And that everybody has evidently been to Heaven.

The Goals Problem Mass implants, which are the apparent basic source of aberration and human travail, which begin with the goal To Forget, were cynically done "in Heaven".

For a long while, some people have been cross with me for my lack of co-operation in believing in a Christian Heaven, God and Christ. I have never said I didn't disbelieve in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants - if a bit more so.

Yes, I've been to Heaven. And so have you. And you have the pattern of its implants in the HCO Bulletin Line Plots. It was complete with gates, angels and plaster saints - and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again - until Scientology.

Before you went to Heaven you were not really very bad or very good, but you didn't think you had lived only once and you had a good memory and knew who you were and enjoyed life. Afterwards ---

The symbol of the crucified Christ is very apt indeed. It's the symbol of a thetan betrayed.

DATA

Additional work and possible corrections need to be done but this is the gist of the matter:

The implants are electronic in nature and follow the pattern of the G.P.M.

The implant station existed on the order of magnitude of 43,000,000,000,000 years ago. (The dates may be part of the implants but do not appear so at this time. However, a possibility of correction of dates is reserved).

Some have been through it once, some more than once.

The first time I arrived and the moment of the implant To Forget was dated at 43,891,832,611,177 years, 344 days, 10 hours, 20 minutes and 40 seconds from 10:02½ PM Daylight Greenwich Time May 9, 1963. The second series was dated to the moment of the implant To Forget as 42,681,459,477,315 years, 132 days, 18 hours, 20 minutes and 15 seconds from 11:02½ PM Daylight Greenwich Time May 9, 1963.

There are no earlier such implants. There are no later such implants.

I evidently have a goal of my own at 305 Trillion (U.S.) years and an actual GPM, all of which pulled into this 43 Trillion year implant.

ADDITIONAL E-METER DATA

Five goals in all may be common to both sequences. The first 3 of the 5 are the same. There are no implants as to time according to the meter. There are no numbers in any implants, but dates rocket read. Implanting was done on a non-visible thetan, but arrival was in a ship in a doll body according to the meter. Star of Bethlehem, Pearly Gates, The Way out of the Universe, all of which RR on the meter, give a clue to recruitment actions.

There was no purpose in giving a particular thetan a particular goal. Planning had no individualization.

A preclear's overts should be scouted as to why these implants keyed in, Fac 1, hypnotism, etc. But doubtful if any preclear did this type of implanting.

The mood is set that thetans are evil, treacherous and bad but this is all part of the implant, not factual.

The earliest point of the series is not known at this writing but possibly contains a recruitment through advertising. The departure method from the series is not fully known yet but probably just abandonment.

Contd...

7894

The implants were not done in a box or in some trick manner of projection. The scenery is actually there, common Mest Universe space and matter and in the Mest Universe.

The first (43 Trillion) series consists of 29 implanted goals.

The second (42 Trillion) series consists of 21 implanted goals.

The first three goals in both series are the same, To Forget, To Remember and To Go Away. The last goal and one other in both series are the same. The remaining goals are not the same for the two implants.

PERSONALLY PERCEIVED DATA.

The pattern of RIs is different for the two series, consisting in the second series of added RIs below the To Have a Goal-ivity and with a different dwindling of adjectives and adverbs, but are otherwise similar.

Both series have the Gates of Heaven visible. The last implant of both consists of "entering" Heaven. The last goal of both is To Be In Heaven.

The gates of the first series are well done, well built. An avenue of statues of saints leads up to them. The gate pillars are surmounted by marble angels. The entering grounds are very well kept, laid out like Bush Gardens in Pasadena, so often seen in the movies. Aside from the implant boxes which lie across from each other on the walk there are other noises and sounds as though the saints are defending and berating. These are unimportant to the incident.

The second series, probably in the same place, shows what a trillion years of overt acts does (or is an additional trickery to collapse one's time). The place is shabby. The vegetation is gone. The pillars are scruffy. The saints have vanished. So have the Angels. A sign on one (the left as you "enter") says "This is Heaven". The right has a sign "Hell" with an arrow and inside the grounds one can see the excavations like archaeological diggings with raw terraces, that lead to "Hell". Plain wire fencing encloses the place. There is a sentry box beside and outside the right pillar. The road "leading up" to the gates is deeply eroded. An effigy of Joseph, complete with desert clothing, is seen approaching the gates (but not moving) leading a donkey which "carries" the original Madonna and child from "Bethlehem". The implanting boxes lie on either side of this "entering" path at path level.

These are the actual ends of the two series. One backs out the gates, of course, from top oppterm down, as this is the end. The last two RIs after this last goal say "it is the beginning", "Not the end".

The place, by implant and inference, was supposed to be in the sky like a floating island. Actually it was simply a high place in the mountains of a planet and the gates pathway falls away into a gorge, very eroded and bare by the time of the second implant, but heavily forested and rolling at the time of the first.

The beginnings have not at this writing been so well explored by myself. I have not viewed the second beginning (which says it is the end). However I do know that the second series was done in long square tunnels with the implant boxes, not unlike small P.A. speakers with fretwork fronts, on either side.

The first series actually begins with arrival in a "town" (as everything is backwards to upset the time sense). This "town" consisted of a trolley bus, some building fronts, sidewalks, train tracks, a boarding house, a bistro in a basement where there is a "bulletin board" well lighted, and a BANK BUILDING.

The bank is the key point of interest. It is interesting that we use the word "bank" (taken actually from computerology) to indicate the reactive mind.

This bank building was the on-the-corner old-fashioned granite-like construction, two or three stories high, with the door in the rounded front - even a revolving type door. Inside to the left of the entrance door is a rounded counter. Directly across the room are THE stairs.

The top oppterm and terminal of To Forget are at the top of these stairs. The implant then proceeds on down the stairs, step by step, terminals on one side (the left if one were coming up the stairs) the oppterms on the other. The first series (43 Trillion) has all its implant impulses at step level. In the second series the boxes are ear high to a man. By the time the gates are arrived at in the first series, the terminals are on the left as you approach the gates, the oppterms on the right, having been reversed at some point.

Contd...

The first (43 Trillion) series had very fine marble stairs. The same stairs can be seen in any big well kept railway station. They were complete with a white ball held in a wrought iron stand.

The thetan was taken along apparently on a pole trap to which he was stuck. It does not proceed step by step throughout the whole of the implant series, but after the first flight of stairs, goes a ways, stops while several pairs of RIs fire then goes to a new location.

The place seemed to have people in it. But they are all effigies. These seem radioactive. Contact with them hurts. No living beings are seen. But effigies that look like humans are performing sudden, repetitive actions with long halts between. In the "basement" such dummies are seen operating machinery.

The boarding house at the actual beginning has a dummy guest and a landlady in kimono and wrappers, reading a newspaper.

There are no devils or satans that I saw.

There is a passenger getting on the trolley bus, a "workman" halfway down the first stairs of "To Forget "eating lunch" and in To Be in Heaven a gardener or electrician adjusting an implant box behind a hedge and periodically leaping up and screaming.

The place, so long as the implants remain only partially discharged, seems to swim in white and black electronic masses, but these dissipate as the implants are run out by pattern.

One actually "enters" the "town" as the first action. The implants, however, were rigged to make the gates seem the entrance to the incident. One backs through from the town, into the bank, down the steps and eventually out the Pearly Gates, down the hillside and is there let off and abandoned. One might have had a body or its remains at the town but has none when abandoned.

"TO BE IN HEAVEN" is the last goal implanted in both series. The goal may be slightly differently worded in the second series.

This is not a body building implant, though running it gives somatics to chest.

This is not a GE implant. It is the person's own. Running it, particularly badly, brings it down on the body. There are body somatics on it, however, particularly eyes, face, chest, bones.

It apparently only can be run by 3M listing and Rocket Reads. One must have the goal to get the RIs.

CONCLUSIONS.

The place is so full of lies by implant that the preclear becomes quite confused and this review of the actual data is necessary to a successful navigation. However, it is very easy to read more treachery into it than there is in it - which is enough.

However, as the place existed so long it was in a varying state of repair and some change. (This data on time is subject to review). But in 1.2 Trillion years only some of the implant pattern and mock up had shifted. However, there may have been other stations. Only time and research will really tell that.

One must date the preclear's first (earliest) goal to forget, find how many times the preclear went through it, or some such implant station, date the other times and be careful to run only the first of the first series. As this is basic, as in Prepchecking, Sec Checking and old engram running, it tends to ease up the remainder of the implants. But running the implants later than basic is very much harder on the pc even though it can be done. Wherever one misses an RI in an early implant, that repeated RI when found in a later one tends to be very much more heavily charged.

Re-running any implant that has only been partially run tends to rough up the whole implant and make it hard to run.

LUCK

I think we are lucky. It could have been much worse. This Heavenly dream of destruction could have been current, not so long ago. It could have happened often, not just once or twice or three times per pc. But apparently it didn't and is unique in itself.

This is the core of the Reactive Mind. It is all the way South. For here, just once on the whole track, somebody discovered the mechanism of purposes and RIs

Contd....

and utilized them to install religious mania and pin thetans down to "one life" and planets.

The thing was done so well that it has hung up ever since. There are other implants, there are other goals and GPMs, but these are minor and easily found and listed once this key implant series is out of the way.

We were in a position of having an infinite number of pieces to the puzzle. Now we have a finite number which even though very tough are still finite in number. Further, every processing step taken, every RI discharged is a positive gain toward a definite finite result in processing.

Further, we have our hands on an apalling bit of technology where the world is concerned. With rapidity and a Meter it can be shown that Heaven is a false dream and that the old religion was based on a very painful lie, a cynical betrayal.

What does this do to any religious nature of Scientology? It strengthens it. New religions always overthrow the false gods of the old, they do something to better man. We can improve man. We can show the old gods false. And we can open up the universe as a happier place in which a spirit may dwell. What more can you expect? This actually places us far beyond any other beings that are about. It puts us, through increased beingness and a restoration of life, in control of much destiny.

We have now only a few unsolved problems about life, huge though they may be, such as the construction of bodies and how does one establish the character of and communicate, if feasible, with beings who are making trees and insects. There are a few things like these. But I imagine when we finally manage to communicate with beetles under rocks and free them, we'll no doubt find the Creator of Heaven who 43 + Trillion years ago designed and built the Pearly Gates and entrapped us all.

Good Lord, I'd hate to be guilty of that overt. But never mind - you aren't either. That guy is GONE (I hope!)

L. RON HUBBARD

(Note: This HCO Bulletin is based on over a thousand hours of research auditing, analyzing the facsimiles of the reactive mind, and with the help of a Mark V Electrometer. It is scientific research and is not in any way based upon the mere opinion of the researcher. This HCO Bulletin is not the result of the belief or beliefs of anyone. Scientology data reflects long, arduous and painstaking research over a period of some thirty years into the nature of Man, the mind, the human spirit and its relationship to the physical universe. The data and phenomena discovered in Scientology is common to all minds and all men and can be demonstrated on anyone. Truth does not require belief to be truth any more than water requires anyone's permission to run down hill. The data is itself and can be duplicated by any honest researcher or practitioner. We in Scientology seek freedom, the betterment of Man, and the happiness of the individual and this comprises our attitude toward the data found. The data, however, is simply itself, and exists whatever the opinion of anyone may be. The contents of this HCO Bulletin discover the apparent underlying impulses of religious zealotism and the source of the religious mania and insanity which terrorized Earth over the ages and has given religion the appearance of insanity. As the paper is written for my friends it has, of course, a semblance of irreverence).

(Note: All our data on the whole track remains factual and is not taken from any implant. The only error released earlier was the time factors involved in GPMs).

L. RON HUBBARD

LRH:jw

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by L. Ron Hubbard
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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO BULLETIN OF 23 SEPTEMBER 1968

Class VIII

CONFIDENTIAL

RESISTIVE CASES
FORMER THERAPY

Hypnotism, "psycho" analysis, "pyschiatry" and other implant type therapies often key-in and jam the track.

These characters here, on any other planet and on the whole track dramatize implanting. The "therapy" involved would be a temporary relief brought by suggestion.

The wrong data of the "science" itself operates as a whole track lie. Getting well or able depends on establishing truth. These "scientific" lies are alterations of actual laws.

We often note electronics men have a rough case time. This traces to the lies Man uses for his "electrical science". As the subject is based on false assumptions, it itself tends to aberrate.

Therefore we get out of the road any former "therapy". We can rehab any moment of release in it, handle any overrun, et

We also do a new style Remedy B to get old therapies spotted and run back.

The only cases which hang up are

(1) Unaudited cases (lies about grades, etc)

(2) Drug cases (who seek in processing the delusion or madness which exhilarated them on drugs).

(3) Former therapy cases. (In this or past lives.)

(4) Out of valence cases.

(5) Cases who continue to commit overts on Scn.

(6) Case "audited" with their ruds or grades out.

(7) Seriously physically ill cases (where the illness makes too much PTP in PT).

Of all these the former therapy case is apt to be the roughest as any auditing session can be reactively mistaken for the "treatment". The next roughest is the drug case as a false exteriorization often occurs on an enforced basis and may go into restim.

Old therapies include the 2000 yr ago plus or minus Aoscuplepian drug treatment (hillabore) which produced a convulsion and coma and in which the nut practitioner made up as a God and "visited" the patient in a "dream". This outfit was all over the ancient world.

Also the Christian Church used (and uses) implanting (with a squirrel version of the "7s"). These gangsters were the Nicomidians from lower Egypt who were chased out for criminal practices (implanting officials). They took over the Niocene Creed before the year zero, invented Christ (who comes from the crucifixion in R6 75m years ago) and implanted their way to "power". The original Nicomidians date about 600 BC and people who were Christ data at 75 m years ago.

These were drug "therapies", actually implants.

Some drug takers go plowing back into early implants and drug therapies so the two get crossed up on a case.

To isolate the reason for a highly resistive case or high TA you can assess the above 7 items and get a clue. Don't limit it to this lifetime. And don't do it so as to key the person in hard on things he wasn't in. And don't do it unless the case is very hard to get a gain on.

Engram running of a crude sort can be found hundreds, thousands or billions of years ago and consists if it appears, of an overrun. They didn't know much about it and overran them badly.

Implants, psychoanalysis, psychiatry, hypnotism gets all snarled up with sex as these birds would commonly (and do) stage insane sex scenes. They violate the children and wives of officials even today to produce a degrade and to make a scene so insane that the "patient" if he remembers it really thinks he is insane. And if he tries to tell anybody (or if she tries to tell her husband) it's a prompt mess. So these "practitioners" hide their activities in this fashion.

The trouble with such former "therapies" and electric shock, etc. it that it

(a) groups track by the command of the practitioner

(b) appears to be a grouped track because Body Thetans flash their pictures at the moment it happens and so makes multiple pictures and hides the real scene, or

(c) sends the pc to the start of track WAY back and sticks him there out of PT.

The keynote of piloting through messes like this is to A. Know what kind of a mess it is and B. Don't EVER force a pc back track or into anything he doesn't want to confront easily.

Drugs force the person back into these messes and stick him.

One of these former therapy or drug messes is only hard to untangle because they are full of incredibles. The pc doesn't accept them or just try to see what's in them.

The basic rule in any case is reality is proportional to the amount of charge removed and so Reality can be increased simply by removing charge. Those surges of the needle as well as the BDs of the TA are "charge coming off."

Anything eventually resolves if the pc just keeps on getting charge off.

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Charge off the exact grades is the most valuable.

But ANY charge off will make it, even on former "therapies'

L. RON HUBBARD

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In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

DECLARATION OF MARGERY WAKEFIELD IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

DECLARATION OF MARGERY WAKEFIELD

I, Margery Wakefield, declare:

1. I am over the age of 18 years. I am a resident of the State of Florida. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto.

2. I was a member of Scientology from 1968 to 1980.

3. In 1982, I filed a lawsuit, Margery Wakefield v. Church of Scientology of California, United States District Court for the Middle District of Florida, Case No. 82-1313-Civ-T-10 for various wrongful acts committed against me.

4. In settlement of that case in 1986 I had to sign a document which prohibited me from thereafter discussing Scientology with anyone. I did not know that I was signing away such a right, nor that Scientology could later come after me with the aid of the courts to punish me for discussing my knowledge of the organization.

5. After leaving Scientology I became a Christian. I believe that I am saved by the Grace of God through my faith in His Son Jesus Christ. I also believe that I was called to speak out concerning the illegal practices of Scientology, its mind control techniques, and its anti-Christian nature and teachings. Appended hereto as Exhibit A is a true and correct copy of an essay I recently wrote entitled "What Christians Need To Know About Scientology." I have been motivated in speaking my thoughts based on my knowledge and experiences by

the desire to reach the minds of people who are in Scientology and held by its anti-Christian mind control and pseudo-scientific dogma, and the minds of people who might be drawn into Scientology by its misrepresentations concerning its intentions, practices and religion. I believe that it is every Christian's motivation and desire to reach the unsaved with the message of the true gospel and a warning about false teachers like L. Ron Hubbard and false gospels like Scientology. I have felt that the right to speak and teach in this way is something that no court in this country should nor can take away.

6. I know that Scientology says it is a religion, that what it is engaged in is religious practice, and that all of its writings on Scientology are religious scripture. Even according to Scientology's use of the terms "religion" and "religious," therefore, I believe that under the US Constitution I would be free to speak and could not contract away my right to speak about those religious scriptures, practices and experiences. But I also believe that what I experienced in Scientology were my own religious experiences, and what I experienced regarding Scientology after leaving are my own religious experiences, about which I cannot be silenced.

7. Indeed, Scientology's attacks on me and its efforts to silence me after the "settlement" motivated me further, even at great risk to myself and my freedoms, to do what I had

been called to do. Appended hereto as Exhibit B is a true and correct copy of a document filed in my case in 1993 by Scientology entitled "Motion for order to show cause why plaintiff should not be held in criminal contempt." In this motion, which is still pending, Scientology seeks to have me jailed for up to twenty-two years for speaking about Scientology.

8. I want this court to know that I am at great risk in providing Gerald Armstrong with a declaration to support his opposition to Scientology's effort to silence him. I do not wish Scientology to further threaten or attack me. I believe, however, that everyone should be free to speak his thoughts, that the knowledge Armstrong has should not be silenced, and that the use of the courts by Scientology to silence its perceived critics, and thus be free to promote its anti-Christian religion should be opposed.

I declare under the penalty of perjury under the laws of the United States and California that the foregoing is true and correct.

Executed at Tampa, Florida this 7th day of April, 1995.

Margery Wakefield
Margery Wakefield

7904

WHAT CHRISTIANS NEED TO KNOW ABOUT SCIENTOLOGY

"For those of you whose Christian toes I may have stepped on, let me take the opportunity to disabuse you of some lovely myths. For instance, the historic Jesus was not nearly the sainted figure (he) has been made out to be. In addition to being a lover of young boys and men, he was given to uncontrollable bursts of temper and hatred... You have only to look at the history his teachings inspired to see where it all inevitably leads. It is historic fact and yet man still clings to the ideal, so deep and insidious is the biologic implanting...."

"No doubt you are familiar with the Revelations (sic) section of the Bible where various events are predicted. Also mentioned is a brief period of time in which the arch-enemy of Christ, referred to as the anti-Christ, will reign and his opinions will have sway... this anti-Christ represents the forces of Lucifer (literally, the "light-bearer" or "light-bringer"), Lucifer being a mythical representation of the forces of enlightenment... My mission could be said to fulfill the Biblical promise represented by this brief anti-Christ period."

L. Ron Hubbard, Student Briefing, OT VIII Series I

7906

1. INTRODUCTION

The controversial Church of Scientology had its beginnings in 1950 with the publication of the book *Dianetics: The Modern Science of Mental Health* by L. Ron Hubbard.

According to Dianetic theory, the mind is composed of mental image pictures of every event in a person's life. Memories, or pictures, of painful events from the past containing pain or unconsciousness are known in Dianetics as "engrams." By recalling and "erasing" these memories a person can be restored to perfect physical and mental health and analytical functioning. A person whose engrams have all been erased is called a "Clear."

It is the purpose of Scientology to "clear the planet." In other words, that every person in the world will eventually be cleared of his engrams through Dianetic "processing."

By 1954, Hubbard had "discovered" that in order to be truly "clear," a person also had to erase all the engrams from his hundreds of past lives. The new science of Scientology was founded and organized as a religion to incorporate this belief. Sooner or later, most people in Scientology will begin to "remember" (imagine) their past lives.

Scientologists do believe in reincarnation, which is an occult belief.

According to the theology of Scientology, a person is actually an invisible entity, similar to the soul in Christianity. This entity in Scientology is known as the "thetan."

As the thetan becomes relieved of his engrams, he will regain the many godlike powers that are inherently his - powers such as telepathy, "exteriorization" (the ability to be separate from his body with full perception), telekinesis (the ability to move objects with thought), etc. The belief in Scientology is that we were once godlike, and that we have deteriorated over time. The promise of Scientology is that through Scientology counseling, called "auditing," the person can regain these godlike abilities.

A thetan who has been restored to a godlike state is known in Scientology as an "operating thetan," or "OT" (pronounced "oh-tee"). People in Scientology spend exorbitant fees, sometimes as much as $1000 per hour, to attain the exalted state of OT.

Death in Scientology is known as "dropping the body." According to Scientology theory, when a person dies, he (the thetan, or spirit) has been pre-programmed to "return" to an "implant station" out in space. In the implant station, the thetan will have all memories from the most recent lifetime electronically erased, and then the thetan will be sent back to earth to "pick up a new body," or start another life.

But Scientology promises that with auditing, the person can erase this "return command" so that he will never again have to return to an implant station after death. He will then be a "free being," able to drop his body and pick up a new body with full consciousness and self-determinism.

Scientologists therefore believe that they are very ancient beings, with memories that reach millions of years into the past, and that they are inherently immortal, once the impediments to immortality - the engrams - have been erased.

Scientologists believe that they can become gods.

2. L. RON HUBBARD AS LIAR

> "You belong to your father, the devil, and you want to carry out your father's desire. He was a murderer from the beginning, not holding to the truth, for there is no truth in him. When he lies, he speaks his native language, for he is a liar and the father of lies."
> John 8:44

To his followers, L. Ron Hubbard was larger than life. The biographies of Hubbard given within the cult portray the metamorphosis of this legendary man in stages from youthful prodigy, to teenage adventurer, to brave war hero, to the long-suffering messiah who gave his life for all.

Unfortunately, almost every fact in the cult biographies of L. Ron Hubbard is a lie. While the legendary accomplishments of this cult guru could have come unedited from one of his swashbuckling novels, the true facts of his life reveal quite another picture.

As with the Wizard of Oz, once the curtain was drawn, the fearsome wizard was just an ordinary man. So it was with Hubbard.

> "L. Ron Hubbard," the official biography begins, "was born in Tilden, Nebraska, on the 13th of March, 1911. His father was Commander Harry Ross Hubbard of the United States Navy. His mother was Dora May Hubbard...." (1)

So far, everything is true.

The biography continues:

> "Ron spent his early childhood years on his grandfather's large cattle ranch in Montana, said to cover a quarter of the state. It was on this ranch that he learned to read and write by the time he was three and a half years old." (2)

The truth is that Hubbard's grandfather was a small town veterinarian who did not own a cattle ranch in Montana. After Hubbard and his parents relocated to Helena, Montana, where his father was hired to manage a local theater, the grandparents soon followed, bought a house on Fifth Avenue, and the grandfather opened the Capital City Coal Company.

The story continues:

> "L. Ron Hubbard found the life of a young rancher very enjoyable. Long days were spent riding, breaking broncos, hunting coyote and taking his first steps as an explorer. For it was in Montana that he had his first encounter with the Blackfoot Indians. He became a blood brother of the Blackfoot..." (3)

Although these events may have existed in the imagination of a young boy in Montana, that is the only place where they did, in fact, exist.

Young Ron Hubbard lived with his parents in a small apartment on Rodney Street in Helena, and he attended the local kindergarten.

When he was six years old, his father enlisted in the Navy after the start of World War I. For the next few years, Ron and his mother followed Harry to a series of port cities where Harry was stationed.

> "By the time he was twelve years old, young Ron Hubbard had read a large number of the world's greatest classics - and his interest in philosophy and religion was born. Ron Hubbard had the distinction of being the only boy in the country to secure an Eagle Scout badge at the age of twelve years..." (4)

Although Hubbard did receive an Eagle Scout badge, the Boy Scouts of America keeps only an alphabetical listing of Eagle Scouts, with no record of their ages.

> "The following years, from 1925 to 1929, saw the young Hubbard, between the ages of fourteen and eighteen, as a budding and enthusiastic world traveler and adventurer.... Having the financial support of his wealthy grandfather, L. Ron Hubbard spent these years journeying through Asia." (5)
>
> "He was up and down the China coast several times in his teens from Ching Wong Tow to Hong Kong and inland to Peking and Manchuria.
>
> "In China he met an old magician whose ancestors had served in the court of Kublai Khan. In the hills of Tibet he lived with bandits who accepted him because of his honest interest in them and their way of life.
>
> "In the remote reaches of western Manchuria he made friends with the ruling warlords by demonstrating his horsemanship. Deep in the jungles of Polynesia he discovered an ancient burial ground steeped in the tradition of heroic warriors and kings..." (6)

Heady adventures for a teenager!

The truth, however, is a bit more believable. At the age of thirteen, the Hubbards had moved to Bremerton, Washington, where young Ron was an eighth grader at Union High School. Hubbard enjoyed such activities as hiking and camping at the nearby Boy Scout campground.

Two years later, when Ron was a sophomore at Queen Anne High School, his father was unexpectedly posted to Guam, where Ron spent part of the summer, sailing with his mother on the steamship President Madison, with stops in Honolulu, Yokohama, Shanghai, Hong Kong and Manila.

In the spring of his junior year, Ron dropped out of school. Two years later, Ron was enrolled in the Woodward School for boys in Washington, D.C. as a substitute for taking the College Entrance Examination. In 1930, Ron was admitted to George Washington University School of Engineering with a major in civil engineering.

His grades for the first semester ranged from an A in Physical Education, a C in Mechanical Engineering, a D in chemistry, and F's in German and Calculus, earning him a D average. After a second and similar semester, he dropped out of school. Later he would say he had been a student in the first course in atomic physics in the country and that he had a Ph.D. - which he renounced much later when it became known that the degree had been purchased from a California diploma mill.

Soon Hubbard married and began his career as a struggling science fiction writer. His stories began to appear regularly in Astounding Science Fiction magazine.

In 1941, as the United States was drawn into the Second World War, Hubbard was determined to get into the Navy. He composed his own letter of recommendation for the military:

> "I have known him for many years and have found him discreet, loyal, honest and without peer in the art of getting things done swiftly. "For courage and ability I cannot too strongly recommend him." (7)

Hubbard's stories of his naval career serve as an example of his most outrageous fiction writing:

> "Commissioned by the U.S. Navy, Hubbard was ordered to the Philippines at the outbreak of the war and was flown home in the Secretary of the Navy's private plane as the first U.S. returned casualty of the Far East.
> "He served in the South Pacific, and in 1942 was relieved and rushed home to take part in the battle against German submarines as Commanding Officer of a corvette serving in the north Atlantic.
> "After serving in all five theaters of World War II and receiving twenty-one medals and palms, in 1944 he was severely wounded and was taken crippled and blinded to Oak Knoll Naval Hospital." (8)

The truth about Hubbard's war career is quite different.

Hubbard's first job in the Navy was a desk job in public relations. He soon requested a transfer to Navy Intelligence. On his way to this posting, he so antagonized his superior officers that he was sent home, with an entry in his record stating that:

> "This officer is not satisfactory for independent duty assignment. He is garrulous and tries to give impressions of his importance. He also seems to think he has unusual ability in most lines. These characteristics indicate that he will require close supervision for satisfactory performance of any intelligence duty." (9)

The report also added that Hubbard had become "the source of much trouble."

Hubbard was then given another desk job. Eventually, however, he worked his way out of this job, and into the Submarine Chaser Training Center in Miami, Florida. After a few misadventures on training ships under his command, the following notation was placed in his record:

> "Consider this officer lacking in the essential qualities of judgment, leadership and cooperation. He acts without forethought as to probable results. Not considered qualified for command or promotion at this time. Recommend duty on a large vessel where he can be properly supervised." (10)

Subsequently, Hubbard was posted onto the U.S.S. Algol. As the Algol prepared to go into battle, in a strange incident which occurred just before the Algol sailed to the Pacific, Hubbard discovered a homemade gasoline bomb in a coke bottle amidst the cargo being loaded onto the ship. There was an investigation into this curious incident, but the results of the investigation were not recorded. However, that evening, Hubbard was relieved of duty.

> "Crippled and blinded at the end of the war, he resumed his studies of philosophy and by his discoveries recovered so fully that he was reclassified in 1949 for full combat duty. It is a matter of medical record that he has twice been pronounced dead and in 1950 he was given a perfect score on mental and physical fitness reports." (11)

Hubbard reported in sick with a suspected ulcer, and was hospitalized at Oak Knoll Military Hospital in Oakland, California, where he remained until December 5th, 1945, when he was discharged from the Navy.

Contrary to his own report of receiving twenty-one war medals, he received four routine medals which were awarded to all servicemen serving in this war.

He was eventually awarded a small partial disability rating.

Two years later, in a pathetic letter to the Veteran's Administration, Hubbard wrote:

> "This is a request for treatment."
> "After trying and failing for two years to regain my equilibrium in civil life, I am utterly unable to approach anything like my own competence. My last physician informed me that it might be very helpful if I were to be examined and perhaps treated psychiatrically...

"I cannot account for nor rise above long periods of moroseness and suicidal inclinations... I cannot, myself, afford such treatment.
"Would you please help me?
Sincerely, L. Ron Hubbard" (12)

The Veteran's Administration apparently ignored this letter, to the great detriment of the thousands of souls caught up in Hubbard's later voyage into the world of the demonic in the dangerous cult of Scientology.

Had the Veteran's Administration heeded Hubbard's plea for help, the outcome for many might have been different.

The outcome of history is often ordained by the trivial and the mundane. So it was with Hubbard.

3. THE SATANIC ROOTS OF SCIENTOLOGY

"Have nothing to do with the fruitless deeds of darkness, but rather expose them."
Ephesians 5:11

It is a well documented fact that the religion of Hubbard was Satanism. Hubbard's mentor was, in fact, the infamous English black magician Aleister Crowley. Hubbard reportedly discovered Crowley's works as a teenager on a trip to the Library of Congress with his mother.

Thereafter, he was fascinated by Crowley's "Magick," and Crowley became Hubbard's mentor, a relationship that would last until Crowley's death in 1947. In one of his later lectures, Hubbard would refer to Crowley as "my good friend." (1)

Crowley's most famous work was called The Book of the Law in which he expressed his philosophy of life: "Do what thou wilt shall be the whole of the Law." It is a philosophy Hubbard was to live by throughout his life.

Crowley wrote, in The Book of the Law:

> "We have nothing with the outcast and the unfit; let them die in their misery. Compassion is the vice of Kings; stamp down the wretched and the weak; this is the law of the strong; this is our law and the joy of the world.
> "I am of the snake that giveth Knowledge and Delight, and stir the hearts of men with drunkenness. To worship me take wine and strange drugs... They shall not harm ye at all. It is a lie, this folly against self... Be strong, Oh man! Lust, enjoy all things of sense and rapture... the kings of the earth shall be kings forever; the slaves shall serve.
> "Them that seek to entrap thee, to overthrow thee, them attack without pity or quarter, and destroy them utterly.
> "I am unique and conqueror. I am not of the slaves that perish. Be they damned and dead! Amen." (2)

Many of Crowley's beliefs have been incorporated into Scientology, especially in the secret upper levels of Scientology, called the "OT levels."

Following in Crowley's footsteps, Hubbard adopted some of the practices of the black magician, including the use of drugs and the use of affirmations.

According to Hubbard's son, his father regularly used illegal drugs including amphetamines, barbiturates and hallucinogens including cocaine, peyote and mescaline. (3)

Among the many affirmations that Hubbard was known to have used was the following:

> "All men shall be my slaves! All women shall succumb to my charms! All mankind shall grovel at my feet and not know why!" (4)

After being discharged from the Navy in December of 1945, Hubbard did not head for home, where his wife and two small children were living in Bremerton, Washington. He instead headed directly for a house in Pasadena, California, where an eclectic assortment of people lived including one Jack Parsons, the leader of a satanic organization called the Ordo Templis Orientis. That was the U.S. name for the organization headed in England by Crowley.

Parsons wrote to Crowley about Hubbard:

> "About three months ago I met Ron... a writer and explorer of whom I had known for some time. He is a gentleman; he has red hair, green eyes, is honest and intelligent, and we have become great friends. "Although Ron has no formal training in magick, he has an extraordinary amount of experience and understanding in the field. From some of his experiences I deduce that he is in direct touch with some higher intelligence, possibly his guardian angel. "Ron appears to have some sort of highly developed astral vision. He described his angel as a beautiful winged woman with red hair, whom he calls the Empress, and who has guided him through his life, and saved him many times.
> "We are pooling our resources in a partnership which will act as a limited company to control our business ventures.
> "I need a magical partner. I have many experiments in mind..." (5)

Hubbard and Parsons struck up an occult partnership, the result of which was a series of rituals they carried out with the objective of producing a "moonchild," an incarnation of "Babylon" in an unborn child. A woman in the house was chosen to be the mother of this satanic child.

> "In order to obtain a woman prepared to bear this magical child, Parsons and Hubbard engaged in eleven days of rituals.
> "All this seemed to achieve its desired result and, on January 18th, Parsons found the girl who was prepared to become the mother of Babalon, and to go through the required incantation rituals. During these rituals, which took place on the first three days of March 1946, Parsons was High Priest and had sexual intercourse with the girl, while Hubbard who was present acted as skryer, seer, or clairvoyant and described what was supposed to be happening on the astral plane." (6)

Parsons wrote to Crowley:

> "I am under command of extreme secrecy. I have had the most devastating experience of my life between February second and March fourth. I believe it was the result of the ninth degree working with the girl... I have been in direct touch with

> the One who is most Holy and Beautiful as mentioned in the Book of the Law. First instructions were received direct through Ron, the Seer. I have followed them to the letter. There was a desire for incarnation. I am to act as instructor guardian guide for nine months, then it will be loosed upon the world. That's all I can say for now..." (7)

Crowley remained unimpressed. He wrote to one of his associates:

> "Apparently Parsons and Hubbard or somebody is producing a moonchild. I get fairly frantic when I contemplate the idiocy of these louts." (8)

Later, Hubbard was to reveal some of his occult beliefs to his son in a conversation documented by L. Ron Hubbard, Jr.:

> "We were in Philadelphia. It was November 1952. "Every night in the hotel, in preparation for the next day's lecture, he'd pace the floor, exhilarated by this or that passage from Aleister Crowley's writings.
> "Just a month before, he had been in London, where he had finally been able to quench his thirst; to fill his cup with the true, raw, naked power of the magick. The lust of centuries at his very fingertips.
> "To stroke and taste the environs of the Great Beast, to fondle Crowley's books, papers, and memorabilia had filled him with pure ecstasy!
> "In London he had acquired, at last, the final keys; enabling him to take his place upon the 'Throne of the Beast,' to which he firmly believed himself to be the rightful heir.
> "'The books and contents to be kept forever secret,' he says. To reveal them will cause you instant insanity; rip your mind apart; destroy you,' he says.
> "'Secrets, techniques and powers I alone have conquered and harnessed. I alone have refined, improved on, applied my engineering principles to. Science and logic. The keys! My keys to the doorway of the Magick, my magick! The power!'
> "'I've made the Magick really work,' he says. 'No more foolish rituals. I've stripped the Magick to basics - access without liability.'
> "'Sex by will,' he says. 'Love by will - no caring and no sharing - no feelings. None,' he says. 'Love reversed,' he says. 'Love isn't sex. Love is no good; puts you at effect. Sex is the route to power,' he says. 'Scarlet women! They are the secret to the doorway. Use and consume. Feast. Drink the power through them. Waste and discard them.'
>
> "'Scarlet?' I ask.
>
> "'Yes Scarlet: the blood of their bodies, the blood of their souls,' he says.
> "'Release your will from bondage. Bend their bodies; bend their minds; bend their wills; beat back the past. The present is all there is. No consequences and no guilt. Nothing is wrong in the present. The will is free - totally free; no feelings; no effort; pure thought - separated. The Will postulating the Will,' he says.

> "'Will, Sex, Love, Blood, Door, Power, Will. Logical,' he says.
> "'The doorway of Plenty. The Great Door of the Great Beast.' (9)

It is possible that Hubbard not only believed in Satan - he believed he was Satan!

> "According to Ron (Hubbard) Jr., his father considered himself to be the one 'who came after'; that he was Crowley's successor; that he had taken on the mantle of the 'Great Beast.' He told him that Scientology actually began on December the 1st, 1947. This was the day Aleister Crowley died." (10)

This is the foundation of Scientology, the "Road to Total Freedom"!

4. SCIENTOLOGY AND CHRISTIANITY

"Jesus answered, 'Watch out that no one deceives you. For many will come in my name, claiming, 'I am the Christ,' and will deceive many."
Matthew 24:4-5

Hubbard's teachings about Christ are somewhat contradictory. In an earlier writing he states that Christ never existed but was only an idea electronically implanted in our minds during the "between lives" period (he called this implant "R6").

> "Somebody on this planet, about 600 B.C. found some pieces of "R6."
> "I don't know how they found it; either by watching madmen or something. But since that time they have used it. And it became what is known as Christianity.
> "The man on the cross. There was no Christ!
> "The Roman Catholic Church, through watching the dramatizations of people picked up some little fragments of R6." (1)

Then in a later writing he portrays Christ differently:

> "For those of you whose Christian toes I may have stepped on, let me take the opportunity to disabuse you of some lovely myths. For instance, the historic Jesus was not nearly the sainted figure (he) has been made out to be. In addition to being a lover of young boys and men, he was given to uncontrollable bursts of temper and hatred... You have only to look at the history his teachings inspired to see where it all inevitably leads. It is historic fact and yet man still clings to the ideal, so deep and insidious is the biologic implanting." (2)

Similarly, Hubbard's overall tone when writing about Christianity in general is usually derogatory:

> "The whole Christian movement is based on the victim... They won by appealing to victims. We can win by converting victims. Christianity succeeded by making people into victims. We can succeed by making victims into people." (3)

And:

> "Very often you will find aberrative personalities addicted to religion, but the addiction will not be accompanied by any belief in the human spirit. Just how this paradox is accomplished - a professed avowal of Christianity and a complete unwillingness to accept any effort to heal or help the human spirit - is another one of the paradoxes which mark the aberrative personality." (4)

Hubbard, in fact, believed himself to be the reincarnation of Buddha, as expressed in his poem, The Hymn of Asia:

"Everywhere you are
I can be addressed
But in your temples best
Address me and you address
Lord Buddha
And you then address
Meitreya."

Hubbard writes that Christianity is simply an extension of Buddhism:

> "And the parables of Gautama Buddha were re-expressed with some differences and additions to spread westward again as Christianity." (5)

And then Hubbard teaches that the goals set by Christ find their fulfillment in Scientology:

> "This science (Scientology) is formed in the tradition of ten thousand years of religious philosophy and considers itself a culmination of the searches which began with the Veda, the T'ao, Buddhism, Christianity and other religions... Scientology can demonstrate that it can attain the goals set for man by Christ, which are: Wisdom, Good Health, and Immortality." (6)

In a curious piece of writing, Hubbard states that he has been to "heaven" three times in his past lives. Heaven, according to Hubbard, is an implant; and in one course he draws the pattern of the implant in something called a Line Plot:

> "Well, I have been to heaven.
> "Yes, I've been to heaven. And so have you. And you have the pattern of its implants in the... Line Plots. It was complete with gates, angels and plaster saints and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again until Scientology.
>
> "For a long while, some people have been cross with me for my lack of cooperation in believing in a Christian Heaven, God and Christ. I have never said I didn't believe in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants....
>
> "The symbol of the crucified Christ is very apt indeed. It's the symbol of the thetan betrayed." (7)

According to Hubbard's son, Hubbard considered himself to be Crowley's successor. When Crowley died in 1947, Hubbard believed that he had taken on the "mantle of the Great Beast," and that he was in fact the anti-Christ.

He makes this claim in a late writing:

> "No doubt you are familiar with the Revelations (sic) section of the Bible where various events are predicted. Also mentioned is a brief period of time in which an arch-enemy of Christ, referred to as the anti-Christ, will reign and his opinions will have sway... this anti-Christ represents the forces of Lucifer (literally, the "light-bearer" or "light-bringer"), Lucifer being a mythical representation of the forces of enlightenment... My mission could be said to fulfill the Biblical promise represented by this brief anti-Christ period." (8)

In this same essay, he also predicts that after his death, he will return as the anti-Christ of the Bible. He also states that the so-called "Second Coming" of Christianity will actually be an invasion of earth by a race called the Marcabians from outside the universe. But Hubbard, as the anti-Christ, will return to save us:

> "I will return not as a religious leader but a political one... I will not be known to most of you, my activities misunderstood by many, yet along with your constant effort... I will effectively postpone and then halt a series of events designed to make happy slaves of us all." (9)

When new people are inducted into Scientology they are often told that Scientology is non-denominational, and that there is no inherent conflict between Scientology and any religion, including Christianity. But it is common for Scientologists to be less than truthful to the public at the outset. By calming the new person's misgivings, they know that by the time the person has become fully indoctrinated into Scientology, these misgivings will no longer matter.

I hope that it is now clear that there is no compatibility between Scientology and Christianity; in fact, as a belief system based on satanic principles, Scientology is diametrically opposed to Christianity. The truth is that you cannot be both a Christian and a Scientologist.

The choice is up to you.

5. THE PROPAGANDA OF SCIENTOLOGY

"But there were also false prophets among the people, just as there will be false teachers among you. They will secretly introduce destructive heresies, even denying the sovereign Lord who bought them - bringing swift destruction on themselves."
2 Peter 2:1-2

From one's first day in Scientology, one is constantly bombarded by propaganda. In the hundreds of tape recorded messages of Hubbard and the thousands of printed pages studied daily, one's world view is constantly being shaped according to the paranoid world view of the cult leader. This world view has nothing to do with Christianity.

In all of the propaganda of Scientology, three lessons predominate:

1. That there is a problem.
2. That there is a solution to the problem.
3. That the solution can only be found in Scientology.

The first problem posed by Hubbard is the imminent danger of nuclear war. And only Scientology has the potential to thwart this danger:

> "We are the only people and the only organizations on Earth which have the technology and the ambition to attempt a clarification of situations which in other hands are considered entirely out of control, to wit, the atomic bomb and the decay and confusion of central governments." (1)

And:

> "In the same period in history, two of the most sweeping forces Man has known have come to fruition: a knowledge of himself and others with Scientology, and a means of destroying himself and all others by atomic fission. Which force wins depends in a large measure on your use of Scientology." (2)

And:

> "The mission of Scientology is not conquest - it is civilization. It is a war upon stupidity, the stupidity of which leads us to the Last War of All." (3)

And:

> "The primary race of Earth is not between one nation and another today. The only race that matters at this moment is the one being run between Scientology and the

> atomic bomb. The history of man, as has been said by well-known authorities, may well depend upon which one wins." (4)

The second problem posed by Hubbard is that mankind is caught in a trap, and that he has been in this trap for millions of years during which he has been recycling back to earth through an endless series of lifetimes. It is only through Scientology auditing that he can escape this trap:

> "In fifty thousand years of history on this planet alone, Man never evolved a workable system. It is doubtful if, in foreseeable history, he will ever evolve another.
> "Man is caught in a huge and complex labyrinth. To get out of it requires that he follow the closely taped path of Scientology." (5)

And:

> "We're free men and women - probably the last free men and women on Earth.... If we don't do a good job now we may never get another chance." (6)

And:

> "Is there a way out?
> "Yes there is.
> "We have it in Scientology now. I have found it and charted it. I know exactly how to open the gate." (7)

And:

> "The whole agonized future of this planet, every Man, Woman and Child on it, and your own destiny for the next endless trillions of years depends on what you do here and now with and in Scientology." (8)

The Scientologist is trained to believe that the only hope for the salvation of mankind is the "science" of Scientology. That there is no other hope.

> "In all the broad universe there is no other hope for man than ourselves." (9)

And:

> "Let us face the reality of this thing. The world confronts several crises. Man's inhumanity to Man is gaining monuments daily. The time to bring a chaos under control is before it is well begun. We're slightly late as it is. Brutally, there is no other organization on Earth that can slow these down. Factually there is no other know-how on Earth that can plumb the problems of Man. So if we don't want all of us to be sitting amongst the charred embers, we had better get busy." (10)

And:

"We are the first group on earth that knew what they were talking about. All right, sail in. The world's ours. Own it." (11)

And:

"Auditors have since the first session of Scientology been the only individuals on this planet in this universe capable of freeing Man. (12)

Scientology is presented to believers in global terms as "The Road to Total Freedom" and as "The Only Hope for Mankind." The goal of every Scientologist is nothing less than to "Clear the planet," to ensure the salvation of every person on earth through the attainment of the Scientology state of "Clear."

"We're playing for blood, the stake is Earth." (13)

And:

"The purpose of the Field Staff Member (a Scientologist) is: To help LRH (Hubbard) contact, handle, salvage and bring understanding to individuals and thus the peoples of Earth." (14)

And:

"Now, without further discourse, let's get hot. This is Scientology - the freedom for Man. Let it be known." (15)

And:

"Scientology - The Road Sign Out.
"We are the Free People. We LIVE! We're FREE!" (16)

And:

"There is no greater game in the Universe than Scientology, for it is the only game in which everybody wins." (17)

And:

"The Valuable Final Products of a Scientologist are:
DISSEMINATED KNOWLEDGE
PURCHASED BOOKS
ENVIRONMENTAL CONTROL
A CLEARED PLANET" (18)

And:

> "The eons march on... Perhaps, this time, due to our efforts, a humanitarian world can exist. We, the Prophets of the Morrow, know the way." (19)

Scientology wants you - your mind, your spirit, your soul.

"No one can serve two masters." Matthew 6:24

Jesus Christ or L. Ron Hubbard - who will your master be?

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6. CREATION ACCORDING TO SCIENTOLOGY:

THE FACTORS, by L. Ron Hubbard

1. Before the beginning was a Cause and the entire purpose of the Cause was the creation of effect.

2. In the beginning and forever is the decision and the decision is TO BE.

3. The first action of beingness is to assume a viewpoint.

4. The second action of beingness is to extend from the viewpoint, points to view, which are dimension points.

5. Thus there is space created, for the definition of space is: viewpoint of dimension. And the purpose of a dimension point is space and a point of view.

6. The action of a dimension point is reaching and withdrawing.

7. And from the viewpoint to the dimension points there are connection and interchange. Thus new dimension points are made. Thus there is communication.

8. And thus there is light.

9. And thus there is energy.

10. And thus there is life...."

(There are thirty Factors in all)

Humbly tendered as a gift to man by
L. Ron Hubbard
April 23, 1953

7. THE CREED OF SCIENTOLOGY

"We of the Church believe:

That all men of whatever race, color or creed were created with equal rights.

That all men have inalienable rights to their own religious practices and their performance.

That all men have inalienable rights to their own lives.

That all men have inalienable rights to their own sanity.

That all men have inalienable rights to their own defense.

That all men have inalienable rights to conceive, choose, assist and support their own organizations, churches and governments.

That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others.

That all men have inalienable rights to the creation of their own kind.

That the souls of men have the rights of men.

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in nonreligious fields.

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

And we of the Church believe:

That man is basically good.

That he is seeking to survive.

That his survival depends upon himself and upon his fellows, and his attainment of brotherhood with the Universe."

Etc.

7926

8. SCIENTOLOGY EVALUATED IN THE LIGHT OF BIBLICAL CHRISTIANITY

from Those Curious New Cults by William J. Petersen

"How, then, can Scientology be evaluated by biblical Christianity?

First, its primary assumption that man is basically good is not biblical. Familiar scriptures such as "For all have sinned and come short of the glory of God," and "All our righteousnesses are as filthy rags," indicate quite clearly that the Bible and Hubbard are not in the same corner.

Second, Scientology's highest authority is not Jesus Christ or the Christian Bible but a science fiction writer named L. Ron Hubbard. In some ways, the Scientology organization is disturbingly similar to Orwell's 1984 with Ron Hubbard as "Big Brother."

Third, to Scientology God is irrelevant. Scientology alone is relevant. Whether God exists or not is not a matter of concern.

Fourth, Scientology has no salvation to offer the poor. Books are sold, counseling sessions are expensive. Nothing is said about the plight of the poor, the sick, the homeless and oppressed. According to Time magazine, one woman said, "It's the only church I've seen with a cashier's booth." Contrast that to biblical Christianity which offers salvation without money and without price.

Fifth, Scientology has a warped code of ethics. In the Scientology code are such statements as "Never fear to hurt another in a just cause," and "To punish to the fullest extent of my power anyone misusing or degrading Scientology to harmful ends." Such statements bear no resemblance to the words of Jesus: "Turn the other cheek," and "Love your enemies, bless them that curse you, do good to them that hate you and pray for them that spitefully use you and persecute you."

And sixth, Scientology deifies man. In fact, in their writings, man is often capitalized. Man's reason will produce perfect behavior and therefore solve all the problems of the human predicament."

9. A SUMMARY OF THE MAIN DIFFERENCES BETWEEN SCIENTOLOGY AND CHRISTIANITY

from The Challenge of the Cults by Maurice Burrell

Scientology	Christianity
1. AUTHORITY	
Although the Bible is used to bolster up the sect's ideas, the source of Scientology's philosophy and technology is Hubbard himself.	As the Word of God, the Bible is the yardstick against which all claims (including those of Hubbard) have to be measured.
2. GOD	
Although Hubbard and many of his followers are theists, belief in God is not essential to Scientology.	God is Trinity, Father, Son and Holy Spirit, three Persons within the unity of the Godhead.
3. CHRIST	
Christ has no essential or central place in the sect's teachings.	"God sent his Son to be the Savior of the world."
4. SALVATION	
Man is basically good, but "engrams" (psychological hang-ups) prevent him from reaching his full potential. When released from these engrams through the sect's techniques, man begins to live on a higher level in terms of his own human achievement.	Man needs to be saved from sin and to be given new life. Both are available from God through faith in Christ.

7928

10. NOTES

(all underlined entries are by L. Ron Hubbard)

TWO:

1. Corydon, p. 219
2. Ibid, p. 219
3. Ibid, p. 219
4. Ibid, p. 220
5. Ibid, p. 220
6. Miller, p. 26
7. Ibid, p. 93
8. Ibid, p. 95
9. Ibid, p. 98
10. Ibid, p. 107
11. Facts About L. Ron Hubbard
12. 1947 Letter to the VA

THREE:

1. Miller, p. 135
2. Corydon, p. 49
3. Ibid, p. 53
4. Ibid, p. 53
5. Ibid, p. 255
6. Ibid, p. 256
7. Ibid, p. 257
8. Ibid, p. 257
9. Ibid, p. 307
10. Ibid, p. 50

FOUR:

1. Routine R6EW
2. Student Briefing, OT VIII, Series 1
3. Technically Speaking
4. From PABS, Book 1
5. From PABS, Book 3
6. From PABS, Book 1
7. Routine 3 Heaven
8. Student Briefing, OT VIII, Series 1

9. Ibid

FIVE:

1. Purpose
2. Fundamentals of Thought
3. Ibid
4. Ibid
5. Safeguarding Technology
6. Your Post
7. Escape
8. Keeping Scientology Working
9. Ron's Journal 1967
10. The Eighteenth A.C.C.
11. The World is Ours
12. Auditors
13. Policy Letter 7 Nov 1962
14. Field Auditors
15. The Public Divisions
16. We Are the Free People
17. Contests and Prizes
18. Org Board Division Six
19. Scientology: The Philosophy of a New Age

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

MARGERY WAKEFIELD,)
Plaintiff,)
vs.) Case No. 82-1313-Civ-T-10
THE CHURCH OF SCIENTOLOGY)
OF CALIFORNIA, etc.,)
Defendant.)

IN CAMERA

MOTION FOR ORDER TO SHOW CAUSE WHY PLAINTIFF SHOULD NOT BE HELD IN CRIMINAL CONTEMPT

The Church of Scientology of California ("Church"), Defendant above and Movant herein, moves the Court for an Order requiring Plaintiff, Margery Wakefield, to Show Cause why she should not be held in criminal contempt for the violation of the terms of the preliminary and permanent injunction entered by this Court on May 16, 1989. The basis for this motion, as more particularly set forth herein and the attached exhibits and in the accompanying Memorandum of Law, is that Wakefield recently appeared on a television program which was broadcast on November 18, 1992, during which Wakefield made statements which she knew to violate this Court's permanent injunction. In support of this motion the Church alleges:

1. Margery Wakefield and the Church entered into a Settlement Agreement in the above-styled case which was approved by this Court and filed under seal with the Court on August 14, 1986.

EXHIBIT
2

2. Paragraph 5 of the Settlement Agreement provided that the parties promised and agreed for valuable consideration to comply with every term, condition and undertaking contained in the transcript of the in camara proceedings of July 11, 1986, a copy of which was attached to the Settlement Agreement as Exhibit 3. The parties further agreed that the Settlement Agreement would be enforceable by this Court.

3. The Church has fully complied with all the terms and conditions of the Settlement Agreement.

4. On July 2, 1987 the Church filed a Motion to Enforce Settlement Agreement and to Enjoin Plaintiff from violating the terms of the Settlement Agreement.

5. On May 16, 1989, the Court entered a Preliminary and Permanent Injunction against Margery Wakefield which provided in relevant part as follows:

> That Margery Wakefield is restrained and enjoined from disclosing to other persons, not members of her immediate family, matters relating to: a) the substance of her complaint against the Church; b) the substance of her claim against the Church; c) alleged wrongs committed by the church; d) the contents of the documents which were returned to the Church pursuant to the settlement agreement or similar fact evidence.

6. On July 18, 1989 the Church filed motions to hold Wakefield in civil and/or criminal contempt for repeated violations of this Court's May 16 injunction, as a result of published interviews Wakefield granted to various newspapers and radio and television stations. This Court referred the matter to

Magistrate Paul Game, Jr. for a hearing which was held in October and November, 1989.

7. In a Report and Recommendation dated June 25, 1990, Magistrate Game concluded that Wakefield had engaged in a total of forty-four separate willful violations of this Court's injunction which would warrant findings of civil contempt. Additionally, Magistrate Game deferred to this Court's discretion whether a referral should be made to the United States Attorney's office for prosecution of Wakefield on criminal contempt charges. Magistrate Game's June 25, 1990 Report and Recommendation is pending before this Court.

8. On November 18, 1992 a television program entitled "Au Nom De La Loi" (In the Name of the Law") was broadcast in Belgium by television station RTBF (the "RTBF Program"). The RTBF Program contained several segments in which Margery Wakefield, who was identified each time by name, spoke on camera in English with a French "voice-over" about her experiences in the Church of Scientology and her views of Scientology. The televised segments involving Wakefield were apparently filmed in the Clearwater, Florida area. In the course of the RTBF program Wakefield made statements which are willful and knowing violations of this Court's May 16, 1989 injunction. Some of the aforementioned statements made by Wakefield on the RTBF Program are identical in substance to statements previously determined by Magistrate Game in his June 25, 1990 Report to have been willful contempts of this Court's injunction by Wakefield in 1989. The

details of Wakefield's recent new violations are set out more fully in the Declaration of Michael Lee Hertzberg, Esq., attached hereto as Exhibit A and are evidenced by excerpts from a certified translation of the RTBF Program attached hereto as Exhibit B.

WHEREFORE, the Church respectfully moves as follows:

1. The Court appoint the United States Attorney or a private attorney to prosecute Wakefield's criminal contempt.

2. That the Court issue an Order requiring Plaintiff, Margery Wakefield, to appear before this Court and show cause why Wakefield should not be adjudged in criminal contempt of this Honorable Court and have sanctions imposed upon her as provided by law including but not limited to a fine of up to $500.00 or imprisonment not exceeding six (6) months for each act of contempt.

3. That Wakefield be required to pay costs and attorneys' fees incurred by the private prosecuting attorney.

Dated: February 12, 1993

PAUL B. JOHNSON, ESQ.
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Attorneys for Defendant-Movant
THE CHURCH OF SCIENTOLOGY
OF CALIFORNIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy hereof has been furnished to MARGERY WAKEFIELD, P.O. Box 290402, Tampa, Florida 33687 by U.S. mail this 12 day of February, 1993.

Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

MARGERY WAKEFIELD,
Plaintiff,
vs.
THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, etc.,
Defendant.

Case No. 82-1313-Civ-T-10

IN CAMERA
DECLARATION OF
MICHAEL LEE HERTZBERG, ESQ.

MICHAEL LEE HERTZBERG hereby declares and states:

1. I am an attorney who has previously appeared before this Court on behalf of the defendant Church of Scientology of California ("the Church") in this matter. My co-counsel is Paul B. Johnson of the firm of Johnson and Johnson in Tampa. I submit this Declaration in support of the Church's Motion for Order to Show Cause Why Plaintiff Should Not Be Held In Criminal Contempt. I have personal knowledge of the facts set forth in this Declaration and could competently testify thereto if called as a witness.

2. On or about November 18, 1992 a television program entitled "Au Nom De La Loi" ("In the Name of the Law") was broadcast in Belgium by station RTBF (the "RTBF Program"). The narration and most of the interviews on the RTBF Program are conducted in French. Some of the interviews are in English with a voice over narration in French.

3. The RTBF Program includes several segments in which Margery Wakefield speaks on camera and is identified by name.

EXHIBIT "A"

Counsel representing the Church herein viewed a videotaped copy of the RTBF Program and concluded that remarks were made by Wakefield during the Program which violated an injunction entered by this Court against Wakefield dated May 16, 1989.

4. Counsel hired a translator, Annette T. Gordon, to translate the RTBF Program from French to English and to prepare a transcript of her translation. Ms. Gordon, who has no relationship to the Church, has experience providing transcriptions from French to English for the United States Customs Service and has also translated from French to English in proceedings in the United States District Court for the Middle District of Florida. Attached as Exhibit B herein are eleven pages containing the portions of the transcript prepared by Ms. Gordon in which Margery Wakefield either speaks or is referred to, together with an affidavit from Ms. Gordon certifying the accuracy of her translation and reciting her professional qualifications. Should this Court desire, the Church will file the forty-one page translation of the entire RTBF Program as well as a copy of the videotape of the Program. The Church has not done so at this time to avoid burdening the Court with excess material.

5. Significant portions of the RTBF Program were filmed in or about Clearwater, Florida, and Clearwater appears to be the venue for the segments involving Wakefield.

6. Wakefield is introduced on the RTBF Program as a former Scientologist qualified to describe what the Church of Scientology is like based upon her personal experience.

7. The narrator of the RTBF Program reports that Wakefield has disclosed that she was transformed by the Church into a "zombie" by techniques of "brainwashing":

> VOICE: For 12 years MARGERY was a convinced Scientologist. And, now she's revealed to us how the sect transformed her into a zombie, an obedient and docile robot. The method is simple and frightening at the same time. A daily drill exacerbated by the techniques of brainwashing.

8. During the RTBF Program Wakefield claimed that the Church's training routines are designed as hypnotic processes:

> MARGERY:
>
> * * *
>
> T-R-O-, the first drill that we did is part of the first Scientology course, which is called "Communication Course." They tell you that this drill serves in helping you better your visual contacts, but, really, is designed to hypnotise. When I was in Scientology, this drill lasted 2 hours.

9. During the RTBF Program Wakefield stated that at the time she worked at the Church's Guardian Office she was aware of the planning of two murders:

> MARGERY:
>
> * * *
>
> Michael Meisner was one of the two people that we had planned to murder in 1979. I think it was. And, the day that I was told that, we had the meeting in the Guardian Office, Michael Meisner was handcuffed to a bed. The Guardian Office had him somewhere

> in hiding. The plan was to take him, the next day, out to sea, out to the bay, tie weights on him and to throw him overboard. In Scientology, it's called "Deep Sixing." That was the plan.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 11, 1993 at New York, New York.

Michael Lee Hertzberg

MICHAEL LEE HERTZBERG

AFFIDAVIT OF TRANSLATOR

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, the undersigned, ANNETTE T. GORDON, being first duly sworn, do certify that the attached transcript is a true and accurate translation from French into English of those portions of the ~~attached~~ video tape entitled "In the Name of the Law" in which MARGERY WAKEFIELD appears.

I received my Bachelor of Arts Degree from the University of Arkansas in English and in French as an Honors graduate in 1971 and received my Masters Degree from the University of Arkansas in 1974. While at the University of Arkansas, I taught French as a teaching assistant.

I am fluent in the English and French languages and have traveled extensively in France.

I have provided transcriptions from French to English for the U.S. Customs Service and I have translated from French to English in proceedings in the United States District Court for the Middle District of Florida.

Annette T. Gordon
ANNETTE T. GORDON

The foregoing instrument was acknowledged before me this 22nd day of January, 1993, by Annette T. Gordon, who has produced a Florida Drivers' License as identification and who did take an oath.

Valerie Aleksandar
Notary Signature

VALERIE ALEKSANDAR
Notary Public, State of Florida
My Comm. Expires Feb. 25, 1994
No. AA742010

EXHIBIT "R"

ORIGINAL

7942

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **DECLARATION OF KEITH SCOTT IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 4/21/95 Time: 9:00 a.m. Dept: One Trial: 5/18/95

DECLARATION OF KEITH SCOTT

I, Keith Scott, declare:

1. I am over the age of 18 years. I am a resident of the State of California and I have personal knowledge of the matters set forth herein. If called upon as a witness herein I could testify competently thereto.

2. I was an active member of the Church of Scientology from February, 1974 to 1979. I studied its "technical" and "management" policies and I became familiar with its organization structure and many of its practices.

3. I am now a Christian. Along with my wife Shawn I have Christian ministry we call the Cults Awareness Ministry. A vital aspect of my ministry to offer advice born of experience people who are going in or thinking about coming out of Scientology. I do this work from a Christian perspective, using the strength and truths I have gained through my faith in Jesus Christ as my Lord and Savior. I expose the untruths of Scientology and explain the dangers to the spiritual well-being and future of people who follow those untruths rather than the truths of the Word of God.

4. I have known Gerry Armstrong for about two years and have communicated with him a few times during this period. I am familiar with the part he played in bringing many of the untruths of Scientology and its founder L. Ron Hubbard to light. I use the information he made public, where applicable, in advising people who are led to me as a result of their doubts about Scientology. I am familiar with the attacks on him by Scientology to impugn his credibility so his information would

not be believed. I am familiar with Scientology's attacks on any critic; and this is one aspect of Scientology which is dangerous and which I expose in my ministry.

5. When I first got involved in Scientology, I was a Christian, but a lapsed one. At that time I believed Scientology's public statements that it accepted Christians, had no essential disagreement with the Christian Faith, and that someone could practice both Christianity and Scientology. The farther I went in Scientology, the clearer it became to me that Scientology in its actual practices and policies was anti-Christian. I understood that if I put my faith in God, or if I proclaimed Christ as my personal savior, I would have been considered "PTS Type III," or psychotic.

6. I believe I was saved from the manipulation and mind control of Scientology by the Grace of God recognized through my faith in His Son, Jesus Christ.

7. Only recently did I see the two bulletins appended hereto as Exhibits A and B respectively, "Routine 3 Heaven," dated May 11, 1963, and "Resistive Cases Former Therapy," dated September 23, 1968. In these bulletins Hubbard asserts that Christ, God and Heaven are implants, designed for the enslavement of man, and that only Scientology can save man from this "religious" slavery. I believe this is a blasphemy of the Holy Spirit, and that people led along Scientology's "road to total freedom" to believe these lies and themselves blaspheme the Holy Spirit, are in danger of eternal damnation.

8. Scientology claims to be a religion, and calls its

practices religious expression, and its management policies and technical bulletins and all other writings about Scientology "scriptures." That may be, for our country permits even the most antisocial organizations to call themselves "religions," and receive all the benefits of the First Amendment. It is entirely inconsistent, however, that our country, through our courts, can stop anyone from his religious expression, speaking out against the dangers of such antisocial organizations.

9. To my wife's and my knowledge, harassment of us from Scientology individuals has been minimal. We say "to our knowledge," because we are so aware of the operations done covertly against critics of Scientology. We feel concern that this will change and that we will become targets because of our friendship with Gerry. Even so, we feel compelled to offer our help.

I declare under the penalty of perjury under the laws of California that the foregoing is true and correct.

Executed in ARCADIA, California, this 5TH day of April, 1995.

Keith Scott

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex.

7946

Central Orgs.
Franchise

HCO BULLETIN OF MAY 11, AD13

ROUTINE 3
HEAVEN

Well, I have been to Heaven.

And I've found that Scientologists have been to Heaven.

And that everybody has evidently been to Heaven.

The Goals Problem Mass implants, which are the apparent basic source of aberration and human travail, which begin with the goal To Forget, were cynically done "in Heaven".

For a long while, some people have been cross with me for my lack of co-operation in believing in a Christian Heaven, God and Christ. I have never said I didn't disbelieve in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants - if a bit more so.

Yes, I've been to Heaven. And so have you. And you have the pattern of its implants in the HCO Bulletin Line Plots. It was complete with gates, angels and plaster saints - and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again - until Scientology.

Before you went to Heaven you were not really very bad or very good, but you didn't think you had lived only once and you had a good memory and knew who you were and enjoyed life. Afterwards ---

The symbol of the crucified Christ is very apt indeed. It's the symbol of a thetan betrayed.

DATA

Additional work and possible corrections need to be done but this is the gist of the matter:

The implants are electronic in nature and follow the pattern of the G.P.M.

The implant station existed on the order of magnitude of 43,000,000,000,000 years ago. (The dates may be part of the implants but do not appear so at this time. However, a possibility of correction of dates is reserved).

Some have been through it once, some more than once.

The first time I arrived and the moment of the implant To Forget was dated at 43,891,832,611,177 years, 344 days, 10 hours, 20 minutes and 40 seconds from 10:02½ PM Daylight Greenwich Time May 9, 1963. The second series was dated to the moment of the implant To Forget as 42,681,459,477,315 years, 132 days, 18 hours, 20 minutes and 15 seconds from 11:02½ PM Daylight Greenwich Time May 9, 1963.

There are no earlier such implants. There are no later such implants.

I evidently have a goal of my own at 305 Trillion (U.S.) years and an actual GPM, all of which pulled into this 43 Trillion year implant.

ADDITIONAL E-METER DATA

Five goals in all may be common to both sequences. The first 3 of the 5 are the same. There are no implants as to time according to the meter. There are no numbers in any implants, but dates rocket read. Implanting was done on a non-visible thetan, but arrival was in a ship in a doll body according to the meter. Star of Bethlehem, Pearly Gates, The Way out of the Universe, all of which RR on the meter, give a clue to recruitment actions.

There was no purpose in giving a particular thetan a particular goal. Planning had no individualization.

A preclear's overts should be scouted as to why these implants keyed in, Fac 1, hypnotism, etc. But doubtful if any preclear did this type of implanting.

The mood is set that thetans are evil, treacherous and bad but this is all part of the implant, not factual.

The earliest point of the series is not known at this writing but possibly contains a recruitment through advertising. The departure method from the series is not fully known yet but probably just abandonment.

Contd...

The implants were not done in a box or in some trick manner of projection. The scenery is actually there, common Mest Universe space and matter and in the Mest Universe.

The first (43 Trillion) series consists of 29 implanted goals.

The second (42 Trillion) series consists of 21 implanted goals.

The first three goals in both series are the same, To Forget, To Remember and To Go Away. The last goal and one other in both series are the same. The remaining goals are not the same for the two implants.

PERSONALLY PERCEIVED DATA.

The pattern of RIs is different for the two series, consisting in the second series of added RIs below the To Have a Goal-ivity and with a different dwindling of adjectives and adverbs, but are otherwise similar.

Both series have the Gates of Heaven visible. The last implant of both consists of "entering" Heaven. The last goal of both is To Be In Heaven.

The gates of the first series are well done, well built. An avenue of statues of saints leads up to them. The gate pillars are surmounted by marble angels. The entering grounds are very well kept, laid out like Bush Gardens in Pasadena, so often seen in the movies. Aside from the implant boxes which lie across from each other on the walk there are other noises and sounds as though the saints are defending and berating. These are unimportant to the incident.

The second series, probably in the same place, shows what a trillion years of overt acts does (or is an additional trickery to collapse one's time). The place is shabby. The vegetation is gone. The pillars are scruffy. The saints have vanished. So have the Angels. A sign on one (the left as you "enter") says "This is Heaven". The right has a sign "Hell" with an arrow and inside the grounds one can see the excavations like archaeological diggings with raw terraces, that lead to "Hell". Plain wire fencing encloses the place. There is a sentry box beside and outside the right pillar. The road "leading up" to the gates is deeply eroded. An effigy of Joseph, complete with desert clothing, is seen approaching the gates (but not moving) leading a donkey which "carries" the original Madonna and child from "Bethlehem". The implanting boxes lie on either side of this "entering" path at path level.

These are the actual ends of the two series. One backs out the gates, of course, from top oppterm down, as this is the end. The last two RIs after this last goal say "it is the beginning", "Not the end".

The place, by implant and inference, was supposed to be in the sky like a floating island. Actually it was simply a high place in the mountains of a planet and the gates pathway falls away into a gorge, very eroded and bare by the time of the second implant, but heavily forested and rolling at the time of the first.

The beginnings have not at this writing been so well explored by myself. I have not viewed the second beginning (which says it is the end). However I do know that the second series was done in long square tunnels with the implant boxes, not unlike small P.A. speakers with fretwork fronts, on either side.

The first series actually begins with arrival in a "town" (as everything is backwards to upset the time sense). This "town" consisted of a trolley bus, some building fronts, sidewalks, train tracks, a boarding house, a bistro in a basement where there is a "bulletin board" well lighted, and a BANK BUILDING.

The bank is the key point of interest. It is interesting that we use the word "bank" (taken actually from computerology) to indicate the reactive mind.

This bank building was the on-the-corner old-fashioned granite-like construction, two or three stories high, with the door in the rounded front - even a revolving type door. Inside to the left of the entrance door is a rounded counter. Directly across the room are THE stairs.

The top oppterm and terminal of To Forget are at the top of these stairs. The implant then proceeds on down the stairs, step by step, terminals on one side (the left if one were coming up the stairs) the oppterms on the other. The first series (43 Trillion) has all its implant impulses at step level. In the second series the boxes are ear high to a man. By the time the gates are arrived at in the first series, the terminals are on the left as you approach the gates, the oppterms on the right, having been reversed at some point.

Contd...

The first (43 Trillion) series had very fine marble stairs. The same stairs can be seen in any big well kept railway station. They were complete with a white ball held in a wrought iron stand.

The thetan was taken along apparently on a pole trap to which he was stuck. It does not proceed step by step throughout the whole of the implant series, but after the first flight of stairs, goes a ways, stops while several pairs of RIs fire then goes to a new location.

The place seemed to have people in it. But they are all effigies. These seem radioactive. Contact with them hurts. No living beings are seen. But effigies that look like humans are performing sudden, repetitive actions with long halts between. In the "basement" such dummies are seen operating machinery.

The boarding house at the actual beginning has a dummy guest and a landlady in kimono and wrappers, reading a newspaper.

There are no devils or satans that I saw.

There is a passenger getting on the trolley bus, a "workman" halfway down the first stairs of "To Forget "eating lunch" and in To Be in Heaven a gardener or electrician adjusting an implant box behind a hedge and periodically leaping up and screaming.

The place, so long as the implants remain only partially discharged, seems to swim in white and black electronic masses, but these dissipate as the implants are run out by pattern.

One actually "enters" the "town" as the first action. The implants, however, were rigged to make the gates seem the entrance to the incident. One backs through from the town, into the bank, down the steps and eventually out the Pearly Gates, down the hillside and is there let off and abandoned. One might have had a body or its remains at the town but has none when abandoned.

"TO BE IN HEAVEN" is the last goal implanted in both series. The goal may be slightly differently worded in the second series.

This is not a body building implant, though running it gives somatics to chest.

This is not a GE implant. It is the person's own. Running it, particularly badly, brings it down on the body. There are body somatics on it, however, particularly eyes, face, chest, bones.

It apparently only can be run by 3M listing and Rocket Reads. One must have the goal to get the RIs.

CONCLUSIONS.

The place is so full of lies by implant that the preclear becomes quite confused and this review of the actual data is necessary to a successful navigation. However, it is very easy to read more treachery into it than there is in it - which is enough.

However, as the place existed so long it was in a varying state of repair and some change. (This data on time is subject to review). But in 1.2 Trillion years only some of the implant pattern and mock up had shifted. However, there may have been other stations. Only time and research will really tell that.

One must date the preclear's first (earliest) goal to forget, find how many times the preclear went through it, or some such implant station, date the other times and be careful to run only the first of the first series. As this is basic, as in Prepchecking, Sec Checking and old engram running, it tends to ease up the remainder of the implants. But running the implants later than basic is very much harder on the pc even though it can be done. Wherever one misses an RI in an early implant, that repeated RI when found in a later one tends to be very much more heavily charged.

Re-running any implant that has only been partially run tends to rough up the whole implant and make it hard to run.

LUCK

I think we are lucky. It could have been much worse. This Heavenly dream of destruction could have been current, not so long ago. It could have happened often, not just once or twice or three times per pc. But apparently it didn't and is unique in itself.

This is the core of the Reactive Mind. It is all the way South. For here, just once on the whole track, somebody discovered the mechanism of purposes and RIs

Contd....

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and utilized them to install religious mania and pin thetans down to "one life" and planets.

The thing was done so well that it has hung up ever since. There are other implants, there are other goals and GPMs, but these are minor and easily found and listed once this key implant series is out of the way.

We were in a position of having an infinite number of pieces to the puzzle. Now we have a finite number which even though very tough are still finite in number. Further, every processing step taken, every RI discharged is a positive gain toward a definite finite result in processing.

Further, we have our hands on an apalling bit of technology where the world is concerned. With rapidity and a Meter it can be shown that Heaven is a false dream and that the old religion was based on a very painful lie, a cynical betrayal.

What does this do to any religious nature of Scientology? It strengthens it. New religions always overthrow the false gods of the old, they do something to better man. We can improve man. We can show the old gods false. And we can open up the universe as a happier place in which a spirit may dwell. What more can you expect? This actually places us far beyond any other beings that are about. It puts us, through increased beingness and a restoration of life, in control of much destiny.

We have now only a few unsolved problems about life, huge though they may be, such as the construction of bodies and how does one establish the character of and communicate, if feasible, with beings who are making trees and insects. There are a few things like these. But I imagine when we finally manage to communicate with beetles under rocks and free them, we'll no doubt find the Creator of Heaven who 43 + Trillion years ago designed and built the Pearly Gates and entrapped us all.

Good Lord, I'd hate to be guilty of that overt. But never mind - you aren't either. That guy is GONE (I hope!)

L. RON HUBBARD

(Note: This HCO Bulletin is based on over a thousand hours of research auditing, analyzing the facsimiles of the reactive mind, and with the help of a Mark V Electrometer. It is scientific research and is not in any way based upon the mere opinion of the researcher. This HCO Bulletin is not the result of the belief or beliefs of anyone. Scientology data reflects long, arduous and painstaking research over a period of some thirty years into the nature of Man, the mind, the human spirit and its relationship to the physical universe. The data and phenomena discovered in Scientology is common to all minds and all men and can be demonstrated on anyone. Truth does not require belief to be truth any more than water requires anyone's permission to run down hill. The data is itself and can be duplicated by any honest researcher or practitioner. We in Scientology seek freedom, the betterment of Man, and the happiness of the individual and this comprises our attitude toward the data found. The data, however, is simply itself, and exists whatever the opinion of anyone may be. The contents of this HCO Bulletin discover the apparent underlying impulses of religious zealotism and the source of the religious mania and insanity which terrorized Earth over the ages and has given religion the appearance of insanity. As the paper is written for my friends it has, of course, a semblance of irreverence).

(Note: All our data on the whole track remains factual and is not taken from any implant. The only error released earlier was the time factors involved in GPMs).

L. RON HUBBARD

LRH:jw
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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO BULLETIN OF 23 SEPTEMBER 1968

Class VIII

CONFIDENTIAL

RESISTIVE CASES
FORMER THERAPY

Hypnotism, "psycho" analysis, "pyschiatry" and other implant type therapies often key-in and jam the track.

These characters here, on any other planet and on the whole track dramatize implanting. The "therapy" involved would be a temporary relief brought by suggestion.

The wrong data of the "science" itself operates as a whole track lie. Getting well or able depends on establishing truth. These "scientific" lies are alterations of actual laws.

We often note electronics men have a rough case time. This traces to the lies Man uses for his "electrical science". As the subject is based on false assumptions, it itself tends to aberrate.

Therefore we get out of the road any former "therapy". We can rehab any moment of release in it, handle any overrun, et

We also do a new style Remedy B to get old therapies spotted and run back.

The only cases which hang up are
(1) Unaudited cases (lies about grades, etc)

(2) Drug cases (who seek in processing the delusion or madness which exhilarated them on drugs).

(3) Former therapy cases. (In this or past lives.)

(4) Out of valence cases.

(5) Cases who continue to commit overts on Scn.

(6) Case "audited" with their ruds or grades out.

(7) Seriously physically ill cases (where the illness makes too much PTP in PT).

Of all these the former therapy case is apt to be the roughest as any auditing session can be reactively mistaken for the "treatment". The next roughest is the drug case as a false exteriorization often occurs on an enforced basis and may go into restim.

Old therapies include the 2000 yr ago plus or minus Aoscuplepian drug treatment (hillabore) which produced a convulsion and coma and in which the nut practitioner made up as a God and "visited" the patient in a "dream". This outfit was all over the ancient world.

Also the Christian Church used (and uses) implanting (with a squirrel version of the "7s"). These gangsters were the Nicomidians from lower Egypt who were chased out for criminal practices (implanting officials). They took over the Niocene Creed before the year zero, invented Christ (who comes from the crucifixion in R6 75m years ago) and implanted their way to "power". The original Nicomidians date about 600 BC and people who were Christ data at 75 m years ago.

These were drug "therapies", actually implants.

Some drug takers go plowing back into early implants and drug therapies so the two get crossed up on a case.

To isolate the reason for a highly resistive case or high TA you can assess the above 7 items and get a clue. Don't limit it to this lifetime. And don't do it so as to key the person in hard on things he wasn't in. And don't do it unless the case is very hard to get a gain on.

Engram running of a crude sort can be found hundreds, thousands or billions of years ago and consists if it appears, of an overrun. They didn't know much about it and overran them badly.

Implants, psychoanalysis, psychiatry, hypnotism gets all snarled up with sex as these birds would commonly (and do) stage insane sex scenes. They violate the children and wives of officials even today to produce a degrade and to make a scene so insane that the "patient" if he remembers it really thinks he is insane. And if he tries to tell anybody (or if she tries to tell her husband) it's a prompt mess. So these "practitioners" hide their activities in this fashion.

The trouble with such former "therapies" and electric shock, etc. it that it

(a) groups track by the command of the practitioner

(b) appears to be a grouped track because Body Thetans flash their pictures at the moment it happens and so makes multiple pictures and hides the real scene, or

(c) sends the pc to the start of track WAY back and sticks him there out of PT.

The keynote of piloting through messes like this is to A. Know what kind of a mess it is and B. Don't EVER force a pc back track or into anything he doesn't want to confront easily.

Drugs force the person back into these messes and stick him.

One of these former therapy or drug messes is only hard to untangle because they are full of incredibles. The pc doesn't accept them or just try to see what's in them.

The basic rule in any case is reality is proportional to the amount of charge removed and so Reality can be increased simply by removing charge. Those surges of the needle as well as the BDs of the TA are "charge coming off."

Anything eventually resolves if the pc just keeps on getting charge off.

The earliest charge is the most important.

Charge off the exact grades is the most valuable.

But ANY charge off will make it, even on former "therapies'

L. RON HUBBARD

LRH:jp:gn

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ORIGINAL

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In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **DECLARATION OF MALCOLM NOTHLING IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 4/21/95 Time: 9:00 a.m. Dept: One Trial: 5/18/95

DECLARATION OF MALCOLM NOTHLING

I, Malcolm Nothling, declare:

1. I am over the age of 18 years. I am a resident in Johannesburg in the Republic of South Africa. I have personal knowledge of the matters set forth herein, and if called upon as a witness herein I could testify competently thereto.

2. I am making this declaration in support of Gerald Armstrong's opposition to motions by the Church of Scientology International for summary adjudication.

3. I was an active member of the Church of Scientology from 1979 through 1986.

4. Appended hereto is a true and correct copy of an affidavit I executed November 11, 1992.

5. I am the plaintiff in the case of Malcolm Nothling vs. Church of Scientology, et al., Case no. 88/19221, in the Supreme Court of South Africa, (Witwatersrand Local Division), for defamation by Scientology and unsatisfactory services from the Scientology organization. I am the defendant in a case, the number for which I do not have to hand, brought by Scientology in the same Court. Scientology alleges in that case that I called its organization leaders trained liars.

6. My case against Scientology was at one time set to go to trial in August, 1991. Prior to that date I carried out a search around the world for anyone willing to testify about the policies and practices of Scientology, a central issue in my case. The only person I located throughout my worldwide search

who was willing to come forward and testify was Gerald Armstrong.

7. Mr. Armstrong did fly to Johannesburg, but did not testify because the Scientology organization was able to obtain a postponement of the trial.

8. Mr. Armstrong was willing to testify without payment of any kind and he was not paid. I knew of the legal threat to Mr. Armstrong should he testify on my behalf, and I am aware of the threat Scientology is to him outside the legal arena. I am aware of Scientology's vindictive, threatening and dangerous policy and practice of "fair game," and in my personal experience I know Mr. Armstrong is "fair game."

9. My family and I spent many hours with Mr. Armstrong while he was in South Africa in 1991. I know he is a person of sincere religious beliefs, and that he was willing to risk attack from Scientology to testify on my behalf because of those beliefs.

10. I have personal knowledge that Scientology claims that all of its policies and practices, including that of "fair game," and other antisocial policies such as "Black Propaganda," "Attack the Attacker," and "Use the Law to Harass" are "religious scriptures."

11. I know from personal experience and my post-Scientology study that Scientology practices a totalitarian kind of mind control that is dangerous to society and individuals, particularly our young people. I lost my first child to Scientology's mind control, and I have two other young children,

so I am in a good position to know the danger.

12. I know that considerable information about Scientology's mind control, policies and practices, and the misrepresentations of L. Ron Hubbard, which Scientology uses to pull people into its clutches, was made public for the first time by Mr. Armstrong. This information is vital in freeing individuals from Scientology's mind control.

13. Appended hereto is a a true and correct copy of Scientology's "creed," on which it bases its claim that it is a religion. I know that the "creed" is a sham. I know that Scientology's management has never believed that all men have the inalienable rights stated, but attacks ruthlessly anyone who utters an opinion they do not like or speaks freely about their "religious" policies and practices.

14. An immediate proof of that fact are Scientology's attempts to silence Gerald Armstrong.

15. When I first became involved with Scientology I believed its representations that it was in agreement with the teachings of the Christian religion and that someone could be both a Christian and a Scientologist. Through time it became clear that these representations were lies, that the upper level policies of Scientology taught that Christ and God are electronically "implanted" ideas which aberrate and enslave mankind, and that only Scientology's auditing has the way to remove these "implants" from the mind of man.

16. In my experience Scientology's auditing does indeed

remove these ideas. But it leaves the individual who remains in Scientology unfeeling, uncaring, aggressive and anti-Christian.

17. It is important for the future of the uninformed, particularly the youth around the world that Mr. Armstrong remain free to impart and discuss his knowledge of the urgent public issues of the "religion" of Scientology.

I declare under the penalty of perjury under the laws of the United States of America and South Africa that the foregoing is true and correct.

Executed in Jhburg, South Africa, this 2 nd day of April, 1995.

Malcolm Nothing

SWORN STATEMENT

I Malcolm Claude Nothling, the undersigned, hereby state the following under oath:

1 I am a Caucasian male 38 years of age, born on 31/08/54.

2 I was a dedicated member of The Church of Scientology from 1979 - 1986.

3 I served in the Special Forces in the South African Defence Force. During this period I became highly skilled in handling firearms. This information was known by senior members of the Church of Scientology in South Africa.

4 In May 1986 I was requested to take up an administrative position at the Church of Scientology's headquarters in Los Angeles.

5 I arrived in Los Angeles on 6th June 1986 expecting to take up an administrative post that urgently needed to be filled. A week after arriving I was seconded to assist with demonstrations outside the Los Angeles Supreme Court in which the case between Lawrence Wollersheim and the Church of Scientology was being heard.

6 I was also promised by the Church of Scientology, on arrival in Los Angeles, that they would attend to some of my previous counselling that had gone horribly wrong. I was experiencing suicidal feelings and feelings of anger and destruction. It required a tremendous effort on my behalf to restrain myself. I had previously submitted a report to the Religious Technology Centre of my condition.

7 During June/July 1986 I was approached by two Scientologists from the San Francisco area, specifically Concorde. Unfortunately I cannot recall their names but one of them had a signwriting business in that area. They proposed that I should assasinate Larry Wollersheim. They would organise the weapon and whatever else I needed to accomplish this task. I cannot say with any accuracy wether or not they had been instructed to organise this from a higher level within the organisation. However, I now find it disturbing that Scientologists, myself included at the time, can consider this method of resolving what they consider to be a problem. In fact I blame the policy within the Church of Scientology known as the 'Simon Bolivar'which encourages these acts against supposed enemies. At the time I seriously considered committing this crime but believed that I was going to be used as the "fall guy" because it would have been easy thereafter to show that I was demonstrating and stating that I found myself in an unstable condition. When I declined I fell out of favour with the Church of Scientology and was expelled without a hearing and on trumped up charges for which I am currently suing the Church of

Scientology.

8 The above is true and I am willing to submit to a polygraph test or any other method to establish the integrity of my statement.

[illegible] my teenwoordigheid aangebring.

I certify that the above statement was taken by me and that the deponent has acknowledged that [illegible] the contents of this statement. This statement was sworn to [illegible] signature or thumbprint was placed thereon in my presence.

te/at Edwater op/on [illegible] om/at 14 00.

COMMISSIONER OF OATHS

Capt. [illegible] v. d. [illegible]

[illegible] 10 [illegible] 1st Ave

Edwater

Capt

RANG
RANK

SA POLISIE
SA POLICE

SOUTH AFRICAN POLICE

1992 -11- 20

SUID-AFRIKAANSE POLISIE

ORIGINAL

7960

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In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **DECLARATION OF JONATHAN ATACK IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 4/21/95 Time: 9:00 a.m. Dept: One Trial: 5/18/95

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DECLARATION OF JONATHAN CAVEN-ATACK

I, Jonathan Caven-Atack, declare:

1. I am over the age of 18 years. I am a citizen of and resident in the United Kingdom. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto.

2. I am making this declaration in support of Gerald Armstrong's opposition to motions by the Church of Scientology International for summary adjudication.

3. This declaration is a supplement to another headed "General Report on Scientology", and should be consulted in conjunction with that other declaration.

4. I am the author of the book **A Piece of Blue Sky** (ISBN 0-8184-0499-X), a 400-page history and analysis of Hubbard and his organizations published by Lyle Stuart Books in the United States.

5. A true and correct copy of my booklet, **The Total Freedom Trap - Scientology, Dianetics and L. Ron Hubbard**, is appended hereto as Exhibit A.

6. The testimony of Gerald Armstrong in his successful defence against the Church of Scientology before Judge Paul Breckenridge (Los Angeles Superior Court case no. C 420153) was an important source of information for both of these publications. Armstrong's testimony was supported by that of other witnesses and through the production of numerous documents. Scientology accepted the validity of these documents and was indeed trying to recover them to prevent publication. These documents included Hubbard's records of black magic ceremonies and hypnotic rituals he had performed. Testimony and exhibits also added to existing evidence concerning Hubbard and Scientology's immoral and illegal attacks upon their perceived opponents under the supposed "scriptural doctrine" of "Fair Game". Much of the evidence in the case was brought to light for the first time. This information has been of tremendous use in freeing victims of Scientology from its deceptions and pernicious effects.

7. As Judge Breckenridge ruled "In addition to violating and abusing its own members' civil rights, the organization over the years with

its 'Fair Game' doctrine has harassed and abused those persons not in the Church whom it perceives as enemies."

8. As soon as I began to openly discuss my views concerning Scientology's immoral practices, I became the target of "Fair Game". I have been "tricked", "sued" and "lied to", as yet I have not been "destroyed". In 1980, executives of Scientology's Intelligence Agency, the Guardian's Office, admitted to a United States court that the doctrine of Fair Game had never been withdrawn. On 22 July 1980, the Fair Game doctrine was "cancelled" for the first time in Scientology's history (Hubbard Communications Office Policy Letter, "Ethics, Cancellation of Fair Game More About"). On 8 September 1983, the Church of Scientology International rescinded this cancellation, re-instituting "Fair Game" as a scriptural doctrine (Hubbard Communications Office Policy Letter, "Cancellation of Issues on Suppressive Acts and PTSes"). Those Scientologists who are aware of the doctrine are obliged to follow it as if it were legally binding. It is a part of their contract with Scientology.

9. Scientology has admitted that the Guardian's Office had control of all Scientology organizations until 1982. It is claimed that at that time, the 1,100 "criminals" who comprised the international staff of the Guardian's Office were dismissed. Factually, many of these staff members have been re-employed. The various "bureaux" of the Guardian's Office were replaced by the Office of Special Affairs, the International Finance Police, and the Association for Better Living and Education. The Office of Special Affairs houses the successor organizations to the Guardian's Office intelligence branches. The former Branch Two, which dealt with "overt data collection", has been restyled "Office of Special Affairs Investigation" or "Invest". The former Branch One (B-1), which dealt with "covert data collection" and "covert operations", uses lawyers to employ private detectives to collect information and run harassment campaigns. I have been the subject of such campaigns for over eleven years.

10. Appended as Exhibit B is a recent example of the Fair Game campaign against me, an anonymous booklet called **Anatomy of a Propagandist**. The author of this booklet obviously had access to an unsworn deposition which has not been entered in any case. Such access could only have been gained through Scientology attorneys Bowles and Moxon. The booklet largely consists of fabricated or grossly exaggerated attacks upon my character. I am currently engaged in litigation against Scientology in the UK for malicious falsehood for the publication of

similar libels and a campaign to destroy my public repute by making anonymous complaints against me.

11. Hubbard ordered his subjects to "attack the attacker". Rather than address the real concerns raised by legitimate enquiry into its practices and policies, Scientology carries out an ad hominem attack on the person raising the concerns. This practice, which Hubbard dubbed "black propaganda" or "dead agenting", is designed and intended to destroy the dissenter's character and credibility so as to draw attention away from legitimate concerns. In this way, Scientology need not reform its practices and can continue with its antisocial behaviour, by bullying critics into silence. Numerous individuals have been silenced through such intimidation.

12. I am aware that Gerald Armstrong has been the subject of an international "Fair Game" campaign. For example, in 1987, after Armstrong and Scientology had supposedly made peace, I was contacted by Richard Palmer, a journalist at the London **Sunday Times** newspaper. Palmer told me that he had just been visited in London by private detective Eugene Ingram an employee of Scientology attorneys Bowles and Moxon. Palmer gave me the business card Ingram had given him and a video tape extracted from surveillance tapes of Armstrong illegally taken by Scientology in or about 1985. Scientology has never relented in its attack upon Armstrong, taking the position that after his "settlement" Armstrong should be entirely silent about Scientology, but that Scientology could continue its campaign of defamation against him. It is my understanding that under this "settlement agreement" Scientology is requesting that Armstrong pay $50,000 for each statement he makes to anyone concerning Scientology. This obtains even if his statements are made to correct Scientology's character assassination of him. It seems unbelievable that the United States courts could become party to this use of the Fair Game law.

13. I sincerely believe that a guarantee of Armstrong's freedom of speech is vital so that individuals can make informed decisions about Scientology. I cannot believe that any rational individual would join Scientology if they were aware of the proven statements of Gerald Armstrong. Denying such informed consent would be tantamount to intellectual fascism, and comparable to the Nazi book burnings.

14. Since 1954, Scientology has drawn upon its constitutional right to style itself a "religion" in the United States. The same right is of

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course granted to other organizations with their origins in black magic and an antidemocratic manifesto. I have known Gerald Armstrong for almost eleven years. He is a man of integrity and honour. He has nothing to gain and everything to lose in his brave struggle to tell the world the truth about Hubbard and Scientology. I know that he follows this path as a matter of religious conviction. He feels that he cannot take the easy way out, but must stand up for the truth, even though he is a lone individual standing up to an organization with hundreds of millions of dollars and tens of thousands of members. If Hubbard is to be seen as the founder of a religion, surely he must be subjected to the same scrutiny that other religious leaders are subjected to. As a Christian might analyse Buddhism, so Armstrong has the right to analyse from his own religious perspective the life and teachings of Hubbard and the activities of Hubbard's "church". The United States Constitution upholds freedom of belief, so must also uphold freedom of disbelief. The Constitution also upholds free speech. Scientology does not charge Armstrong with defamation, but seeks to prevent him from telling the truth. Scientology does this to protect its own economic interests by subverting the free will of its members through information control.

15. It is ridiculous to think that a Christian church would use the judicial system to prohibit one of its former parishioners from talking about the Trinity or the historical truth of the life of Jesus. It is frightening to think that the courts may silence Armstrong who is after all pointing out the irrefutable truth that Hubbard was a black magician who specialised in controlling his victims through hypnosis and exploitative persuasion. Hubbard's own documents and many witnesses support this view conclusively.

16. I have researched and have knowledge concerning Scientology's Fair Game operations against Armstrong's attorney Michael J. Flynn. Flynn was an opponent of Scientology from 1979 to 1986. He championed the victims of Scientology and bravely resisted its smear campaigns, intimidation and legal attacks upon him. In my own dealings with Flynn towards the end of 1986 it became apparent that he was weary of the unrelenting harassment. It is my sincere belief that Flynn was bullied into submission. This opinion is supported by Flynn's failure to support Armstrong in his courageous stand against Scientology's Fair Game litigation. I have seen documents which purport to be part of a settlement between Flynn and Scientology and can only suppose that he has been subject to a "settlement" which has scared him out of supporting his client.

17. In November 1994, the Church of Scientology sought to compel my deposition testimony in its case against Armstong. Under English law, deposition testimony can only be obtained if a witness is unavailable to give testimony at trial. In April 1995, I gave an undertaking to the English court that I was willing to give testimony in this action. My offer has been declined. I can only interpret this as a desire on the part of Scientology to perform cross-examination without giving Armstrong the opportunity to examine me.

I declare under the penalty of perjury under the laws of the United States of America and the United Kingdom that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Radcliffe-on-Trent, England, this 9th day of April, 1995,

J. Caven-Atack
Jonathan Caven-Atack

GENERAL REPORT ON SCIENTOLOGY - DECLARATION OF JONATHAN CAVEN-ATACK

I, Jonathan Caven-Atack, declare that I am over the age of 18 years. I am a citizen of and resident in the United Kingdom. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto. This declaration is supplemental to my declaration in support of Gerald Armstrong's opposition to motions by the Church of Scientology International for summary adjudication.

Background and expertise

1. I was a member of the Church of Scientology from December 1974 to October 1983. During that time I undertook the equivalent of 24 of the 27 available "levels" of Dianetic and Scientology "auditing" ("auditing" is supposedly a form of counselling). I also completed eight courses related to "auditor" or counsellor training as well as courses in recruitment and administration. As a part of my "indoctrination" (the word used by Hubbard for training), I read more than 20 of Scientology founder L. Ron Hubbard's textbooks and listened to about 150 taped Hubbard lectures. I received "auditing" and "auditor" training at Scientology Missions or Churches in Birmingham, Manchester and at the British headquarters at Saint Hill, near East Grinstead.

2. In January 1983, the Church of Scientology published a list of 611 people who had been "declared Suppressive Persons" (JCA-1). Shortly thereafter, I was informed that one of my employees had been similarly "declared a Suppressive Person", and shown Scientology Policy Directive 28, "Suppressive Act - Dealing with a Declared Suppressive Person" (JCA-2). This order forbids Scientologists any contact with any person "declared Suppressive". This policy is known within Scientology as "disconnection". For six months, I wrote letters questioning the "Suppressive Person declare" issued on my employee. During that time I made enquiries of the Master at Arms, or Ethics Officer, at Saint Hill, of the Special Unit, of the International Justice Chief, of the Executive Director International and ultimately of L. Ron Hubbard. The responses I received were evasive.

3. In September 1983, I decided to conduct my own investigation of the Church of Scientology. I was unwilling to have my communication controlled and my freedom of association denied, and uneasy with the attitude of Scientology's new management, who described themselves as "tough" and "ruthless" (JCA-3), and unhappy at the high price charged for Dianetic and Scientology services ("auditing", for example, had risen from #6 per hour in 1978 to over #100 per hour) (JCA-4).

4. Since my resignation from the Church of Scientology, in October 1983, I have assembled a large collection of Scientology and Hubbard related materials, and interviewed well over a hundred former members, including a number of former Hubbard aides. I have also read thousands of pages of court rulings, government enquiry reports, affidavits and sworn testimony relating to Hubbard and Scientology. This research led to the publication, in 1990, of my book A Piece of Blue Sky, which is a history of Hubbard and his organizations. This book has been cited as a principal source of reference in academic papers by professor of sociology and history of religion Stephen Kent ("International Social Control by the Church of Scientology", presented at the Society for the Scientific Study of Religion, November 1991) (JCA-5) and by professor of neuropsychiatry Louis Jolyon West ("Psychiatry and Scientology", presented as the "Distinguished Psychiatrist" lecture, American Psychiatric Association Annual Meeting, Washington DC, 6 May 1992) (JCA-6)

5. I have been retained in connection with the preparation of many court actions in which consideration of Scientology has arisen. In 1984, I assisted in assembling documents as evidence in a child custody case put before Mr Justice Latey ("Re: Wards B & G"). In 1987, I provided documents and affidavits in the successful defence of Russell Miller's biography of Hubbard, Bare-Faced Messiah, heard before Mr Justice Vinelott, in the English High Court. I also prepared documents for the defence of Miller's book in the USA, Canada and Australia. I have been consulted by litigants in the US, Canada, Brazil, Australia, Italy, Switzerland, Spain and

the UK. In these cases, I have prepared documents, recommended relevant documents for discovery, and contacted or recommended witnesses.

6. I was the principal researcher for Russell Miller's Bare-Faced Messiah, and was also consulted by Bent Corydon for his L.Ron Hubbard: Messiah or Madman and by Stewart Lamont for his Religon Inc. I was the principal researcher for the chapter on Scientology in Jean Ritchie's Secret World of Cults. I was also the principal researcher for BBC Panorama and TVS programmes about Scientology (both broadcast in 1987). I have been consulted by television and radio producers, and by journalists throughout the world.

L.Ron Hubbard's intent:

7. Scientology was devised by L.Ron Hubbard as a means of gaining authoritarian control over those deceived into joining any of his many organizations. Hubbard cynically constructed a set of hypnotic techniques which masquerade as therapy and create progressive psychological dependency upon the organizations of Scientology. Hubbard also hid behind the pretence of religion.

8. I can give evidence regarding the techniques commonly employed by Scientology organizations to recruit followers, to create and maintain their loyalty and to sell them courses, supposed counselling, Scientology films, tapes, books and "Special Properties" (highly priced special editions of Hubbard works and Hubbard memorabilia). Although I have no qualification in psychology or psychiatry, I have had contact with several hundred former Scientologists in the last ten years, and feel able to estimate the effect of Scientology upon these former members.

L.Ron Hubbard and the claims of Dianetics and Scientology

9. Despite possession of a massive archive of Hubbard's private papers, including numerous handwritten and illustrated black magic rituals and accounts of Hubbard's extensive drug abuse (JCA-7), Scientology management still deceive Scientologists by perpetuating Hubbard's fictitious claims about his life. Scientology materials make many false claims, including the following: that Hubbard was a wounded and decorated war hero (JCA-8, JCA-9) he suffered from an ulcer (JCA-10, JCA-11) and never saw combat (JCA-12); that Hubbard was a "nuclear physicist" (JCA-13) - he failed a short course in "atomic and molecular" physics which was part of the degree course he failed to complete (JCA-14); that Hubbard had studied for five years as a teenager with holy men in India, China and Tibet (JCA-15, JCA-16, JCA-17) - he spent less than three weeks in China and did not visit India or Tibet (JCA-18, JCA-19, JCA-20). These are a few of the many deceptions created by Hubbard and perpetuated by the cynical managers of Scientology. Gerald Armstrong and Vaughn and Stacey Young were formerly in charge of Scientology's immense "Hubbard Archive" and can testify to this deliberate deception.

10. After a chequered career as the author of adventure stories, Hubbard released his first supposed therapy text, Dianetics: the Modern Science of Mental Health, in 1950 (JCA-21). This book is still sold by the Church of Scientology, which claims sales in the millions.

11. Dianetics was in fact a reworking of techniques abandoned by Freud, where traumatic memories are supposedly re-experienced (JCA-22). In the book Dianetics, Hubbard asserted that memories of physical pain or unconsciousness ("engrams") are "the single and sole cause of aberration and psycho-somatic illness" (ibid, p.68). Such buried traumata supposedly cause people to react to situations without conscious reflection and constitute a "reactive mind".

12. Hubbard adopted Freud's notion that traumata form in "chains" and that it is necessary to find the earliest traumatic memory on such a chain to relieve its symptoms. In Dianetics, Hubbard asserted that the earliest such traumatic memories are birth and prenatal experiences.

13. The book Dianetics describes a purported system of therapy which will supposedly release the individual from compulsions, neuroses, repressions, psychoses, arthritis, bursitis, asthma, allergies, sinusitis, coronary trouble, high blood pressure, the common cold, myopia, schizophrenia, manic depression, dipsomania (ibid, pp.51-52, also p.92), visual and hearing deficiencies (ibid, pp.10-11), dermatitis, migraine, ulcers (ibid, p.92), tuberculosis (ibid, p.93), morning sickness (ibid, p.156), conjunctivitis (ibid, p.126). Hubbard also wrote that his techniques would bring about an individual with "complete recall of everything which has ever happened to him or anything he has ever studied", who would be capable of performing a calculation which a "normal [person] would do in half an hour, in ten or fifteen seconds" (ibid p.171). In later works, Hubbard also asserted that he had found psychological cures for paralysis (JCA-23, p.9), blindness, cancer (JCA-24) and leukaemia (JCA-25, JCA-26), and that his techniques had even be used to raise the dead (JCA-27, p.170).

14. In Dianetics: the Modern Science of Mental Health, Hubbard asserted that his techniques would work on anyone not suffering from brain damage (JCA-21, p.17), and that the outcome of therapy would be a "Clear". A Clear would be free from the disabilities, and possessed of the capabilities, listed in the foregoing paragraph. In 1971, in the Scientology publication "Advance!", the following claim was made: "A Clear has over 135 I.Q., a vibrant personality, glowing health, good memory, amazing vitality, self-control, happiness and more. The most valuable thing you can do for yourself, and for your family, friends and Mankind is attain the state of Clear. You can achieve Clear - not in years but within months through the most advanced technology of the human spirit - Scientology" (JCA-28). A 1988 issue of "The Auditor", a Scientology magazine, asserts that "A Scientology CLEAR has: Over 135 IQ, Creative imagination, Amazing vitality, Deep relaxation, Good memory, Strong will power, Radiant health, Magnetic personality" (JCA-29). Such claims are repeatedly made in literature produced by the Church of Scientology. For instance, a 1991 issue of Scientology's "Celebrity" magazine states: "Scientology auditing can help you - you can get - A higher IQ to handle your problems ... More energy to make more money - Better health ... More years to live." (JCA-30)

15. In 1952, Hubbard incorporated notions of the spirit (or "thetan") and reincarnation into his system. He asserted that we have all existed as spiritual beings for trillions of years (by the 1970s, he was talking of quadrillions). In the 1950s, Hubbard coined the phrase "Operating Thetan", meaning a spirit capable of "operating" separately from its human body ("exterior"). The goal of Scientologists is to be "exterior with full perception". Hubbard defined "Operating Thetan" as the "ability to be at cause knowingly and at will over thought, life, form, matter, energy, space and time, subjective and objective." (JCA-31). Currently, eight "Operating Thetan" levels are available to Scientologists, most of which consist of a form of exorcism, sold to Scientologists for over #300 per hour (JCA-32). Scientologists come to believe that they are possessed by thousands of spirits which can of course lead to mental illness.

16. Many of the fundamental ideas of Scientology can be found in the works of black magician Aleister Crowley. Hubbard recommended Crowley books to his followers and called Crowley "my very good friend" (JCA-33). As with all other magical systems, Scientology seeks to stregthen the will of the individual so that the physical world and other people can be controlled by intention alone. Scientologists believe that by undergoing Hubbard's "processes" they will ultimately be able to order events through "postulates" or wishes. Hubbard promised godlike powers to his followers.

The religious nature of Scientology

17. In a lecture given in 1952, Hubbard asserted: "In 1938 I codified certain axioms and phenomena into what I called SCIENTOLOGY" (JCA-23, p.8). Factually, Hubbard had briefly lost control of Dianetics, so restyled his ideas "Scientology" (He was probably unaware that the word was already in use, meaning "pseudoscientific ideas"). In April 1953, Hubbard wrote to the head of the Hubbard Association of Scientologists, Helen O'Brien, asking for her opinion on "the religion angle" (JCA-34). In December 1953, Hubbard registered the Church of

Scientology, and a parent body called the Church of American Science, in Camden, New Jersey (JCA-35, JCA-36, JCA-37). In February 1954,
Hubbard's associate, Burton Farber, incorporated the Church of Scientology of California (JCA-38). Within a few years all organizations affiliated to Hubbard had been restyled "Churches" of Scientology. These Churches tithed 20 percent of their income to Hubbard's Church of American Science (JCA-35). In March 1954, Hubbard announced that graduate auditors "can be given any one of three or all of the following certificates: DOCTOR OF SCIENTOLOGY, FREUDIAN PSYCHO-ANALYST, DOCTOR OF DIVINITY." (JCA-35).

18. Numerous claims have been made by Hubbard and his organizations for the religious nature of Scientology. In 1954, Hubbard said: "a Scientologist has a better right to call himself a priest, a minister, a missionary, a doctor of divinity, a faith healer or a preacher than any other man who bears the insignia of religion in the Western world" (JCA-38). In a Bulletin of 18 April 1967, Hubbard asserted that "Scientology is a religion by its basic tenets, practice, historical background and by the definition of the word "religion" itself ... Scientology is ... a Religious practice in that the Church of Scientology conducts basic services such as Sermons at Church meetings, Christenings [sic - Scientology makes no claim to be a Christian Church], Weddings and Funerals." (JCA-39). In a Bulletin of 4 May 1972, Hubbard asserted "Dianetics is a science which applies to man, a living organism; and Scientology is a religion." (JCA-40). In the textbook What is Scientology?, first published in 1978, Scientology is defined as "an applied religious philosophy" (JCA-17, p.3). Most Scientology textbooks contain a disclaimer such as the following "This book is part of the works of L. Ron Hubbard, who developed Scientology applied religious philosophy and Dianetics spiritual healing technology." (JCA-41).

19. The Church of Scientology offers a "Minister's Course" to its members (JCA-42). After two weeks of training, Scientology ministers wear dog collars and the Scientology cross and conduct Sunday services, weddings, naming ceremonies and funerals (JCA-43). The Church of Scientology has in the past commissioned religious experts such as E.G. Parrinder (JCA-44) and Frank Flinn (JCA-45) to prepare reports or give testimony to the effect that Scientology is a bona fide religion. The booklet "The Corporations of Scientology" (JCA-46) claims that "In the Scientology religion, the scriptures are all the spoken and written words of L. Ron Hubbard". All Scientology organizations are licensed by the Religious Technology Center, a California based corporation, and sign an agreement accepting that the Dianetics and Scientology teachings are "scripture" (JCA-47). Hubbard's "scriptures" are incontrovertible: "It is hereafter firm Church policy that LRH [Hubbard] ISSUES ARE TO BE LEFT INTACT AS ISSUED [emphasis in original]. No one except LRH can revise his issues." (JCA-48). Since Hubbard's death in 1986, his work has been written in stone.

20. The ambiguity of Scientology's religious claims is evident in a document which discusses the establishment of a Scientology organization in Japan: "Even the point of whether we go religious or non-religious has to be covered as it will determine whether the books mention the Church [of Scientology] or not and whether they have Church symbols, etc." (JCA-49)

21. Scientology has been granted religious tax-exemption in Australia and the USA. However, in Regina v. Segerdal, in July 1970, the then Master of the Rolls, Lord Denning ruled that Scientology is not a religion (JCA-50).

Techniques of Persuasion and Selling Techniques

22. Scientology is a proselytizing faith and all Scientologists are termed "Field Staff Members" and expected to effect conversions. The methods of conversion are spelled out in the Hubbard memoranda reissued in the "Field Staff Member Kit" (JCA-51), in the "Registrar Drills" (JCA-52) and in "FSM Breakthrough - New FSM TRs - Controlling a Conversation" (JCA-53). I was extensively trained in recruiting at the Birmingham Mission of the Church of Scientology, in 1975. The Field Staff Member is instructed to discover through questioning what is "ruining" a person's life (termed "the ruin" by Hubbard) and to exploit any "fear of worsening". Having brought

the individual face to face with their weakness, the Scientology Field Staff Member "brings to understanding" - the understanding that Scientology can solve whatever problem is disclosed.

23. In a tape-recorded lecture Hubbard said the following: "all the social machinery people have actually breaks down before direct intention. But the thing that causes difficulty in moving people along this line of methodology, has a great deal to do with the invasion of privacy. I won't call it privacy because that dignifies it. You have to be willing to invade privacy, very definitely ... If you have a hard time invading people's privacy, you'll have a hard time 8-Cing [controlling - "8-C", literally "infinite control"] them into a chair in an HAS Co-audit unit [Hubbard Apprentice Scientologist], first PE [Personal Efficiency Course], and so forth. Because you think they have rights. Nah [sic]! They don't have any rights! What do you mean? What do they have - what has rights? That machinery? Those dramatizations? Those computing circuits? You mean those things have rights? Hah! Pish-pash [sic] ... If you invade this guy's privacy that just walked in, believe me, he walks straight in." (JCA-54).

24. Hubbard asserted that every individual has a particular emotional level or "tone" (JCA-55, JCA-56), and during recruiting it is necessary to approximate the emotional condition of the would be recruit (Scientologists do elaborate role-playing of emotional states, including the "Mood Training Routines"), so creating rapport. Using emotional manipulation, the individual is reduced to a depressed condition where he or she will realize a desperate "need of change" in his or her life (JCA-57).

25. Hubbard called non-Scientologists "wogs" (JCA-58) or "raw meat" (JCA-59) and said that non-members are "dead" in the "head" (JCA-60) - in a hypnotic daze and therefore easily controllable. Non-Scientologists are held to be in the grip of their "Reactive minds" and so incapable of logical decision. Consequently, Field Staff Members are urged not to discuss the ideas of Scientology, but to play upon the emotional weaknesses of the potential recruit (JCA-51, JCA-61).

26. The most used method of recruitment in Scientology is the Oxford Capacity Analysis Personality Test or "OCA" (JCA-62). This derives from Scientology's "American Personality Analysis" of the early 1950s, which in turn was constructed from existing tests devised by psychologists. The OCA has no connection with Oxford, let alone Oxford University. The original test has long been outdated and was rewritten by individuals with no background in psychology or personality testing. Further, it is made clear in internal literature that far from being a "free" test, its function is solely to recruit people into Scientology (JCA-63).

27. Hubbard openly employed "hard-selling" techniques (JCA-51, under "hard sell", JCA-64). Sales staff undertake frequent (often daily) "hard-sell drilling". Scientology organizations use a printed manual called the "Hard Sell Reference Pack". I frequently experienced the use of such techniques. For instance, on my first visit to the British headquarters, at Saint Hill, in August 1975, I was taken to a staff recruiter at 11 p.m. and remained with her until about 1 a.m. My refusal to join Scientology's paramilitary "Sea Organization", which entails a "billion year" commitment (Scientologists believe in reincarnation), was met with progressively more stern entreaties. I was shown a Hubbard memorandum, which I was assured was entirely secret, which asserted that the third world war was imminent and that the Church of Scientology would be the only organization capable of surviving this holocaust and governing the world beyond it. According to this memorandum, this was the real purpose of the Sea Organization, despite Hubbard's published assertion that Scientology is "non-political". As a last stab, the recruiter told me that anyone who refuses to join the Sea Organization is insane.

28. On one occasion, between June and August 1982, I spent thirteen hours being given a sales interview by Scientologist Peter Buttery at my apartment in East Grinstead. In the same year, I was visited by the same Scientology salesman who had brought Scientologist money-lender Lee Lawrence with him. They attempted to persuade me to borrow #7,000. The assertion was made that after "upper level" Scientology counselling it would be easy for me to recoup

the money and pay back the loan and the 30 percent per annum interest. Lawrence's loan applications had to be approved by Scientology (JCA-65).

29. Scientology sales staff, or "registrars", rapidly form a picture of an individual's assets and borrowing capacity. I have dealt with many individuals whose financial security was undermined by their involvement with Scientology.

30. Scientologists are told that if they fail to undertake certain courses they will be "at risk" (JCA-66). Ominous warnings are often given to those who declare an intention to leave the Churches of Scientology (JCA-67).

31. Sophisticated sales techniques are aquired by Scientology registrars on the "Registrar Salesmanship Course" (JCA-68), and through the application of material in the "Hard Sell Reference Pack" (JCA-64). Scientology registrars spend long hours "drilling" these techniques and learning how to overcome resistance (JCA-52). Such drilling continues throughout the registrar's career, especially after a failure to sell.

32. Hubbard made many extravagant and unfounded claims for Scientology and these are often used by registrars. For instance, in Flag Mission Order 375 Hubbard said: "Advanced Courses [in Scientology] are the most valuable service on the planet. Life insurance, houses, cars, stocks, bonds, college savings, all are transitory and impermanent ... There is nothing to compare with Advanced Courses. They are infinitely valuable and transcend time itself." (JCA-69). In a magazine article, Hubbard said: "For thousands of years men have sought the state of complete spiritual freedom from the endless cycle of birth and death and have sought personal immortality containing full awareness, memory and ability as a spirit independent of the flesh ... In Scientology this state has been attained. It has been achieved not on a temporary basis, subject to relapse, but on a stable plane of full awareness and ability, unqualified by accident or deterioration." (JCA-70).

33. The Scientology attitude towards new recruits is unequivocal. In a 1959 Bulletin, which is still circulated, Hubbard said "NEVER let anyone simply walk out. Convince him he's loony if he doesn't gain on it [an auditing procedure] because that's the truth" (JCA-71). In a Policy Letter which is still a part of most Scientology courses, Hubbard said: "When somebody enrols, consider he or she has joined up for the duration of the universe - never permit an 'open-minded' approach ... If they enrolled, they're aboard, and if they're aboard, they're here on the same terms as the rest of us - win or die in the attempt. Never let them be half-minded about being Scientologists ... When Mrs. Pattycake comes to us to be taught, turn that wandering doubt in her eye into a fixed, dedicated glare ... The proper instruction attitude is '... We'd rather have you dead than incapable.'" (JCA-72). In "Critics of Scientology", Hubbard asserted "it is totally hopeless and fatal not to be a Scientologist." (JCA-73).

34. In a lecture, still sold as part of a Scientology course, Hubbard said "But what kind of a government and what kind of a weapon is really serious? Not a weapon that destroys mud. A weapon that destroys minds, that's serious. Out of the body of knowledge which lies before you [i.e., Scientology] a sufficient technology is [sic - exists?] to take over, seize and handle any government on the face of the Earth ... You can control men like you would control robots with those techniques ... Contained in the knowable, workable portions before your eyes there are methods of controlling human beings and thetans [spirits] which have never before been dreamed of in this universe. Control mechanisms of such awesome and solid proportions that if the remedies were not so much easier to apply, one would be appalled at the dangerousness to beingness [sic] that exists in Scientology ... This universe has long been looking for new ways to make slaves. Well, we've got some new ways to make slaves here." (JCA-74). In private papers revealed to a California court in 1984, Hubbard said "Men are my slaves" (JCA-75).

The hypnotic nature of Scientology

35. An analysis of Hubbard's early publications on Dianetics makes it clear that he had practised hypnosis since his teens. He claimed vast experience as a hypnotist. Dianetics was a fusion of Freudian technique and "light

trance" hypnosis. Hubbard also made it clear that aspects of his original Dianetic technique are hypnotic. Although these practices were briefly suspended in the 1950s, they have been back in full use for more than a decade in all of Scientology's many organizations. For example, in a 1950 lecture, Hubbard withdrew the system of counting people into a state of "reverie" prior to a Dianetic session, "Sometimes people go into a hypnotic trance by accident with this count system" (JCA-76). In his 1951 book Science of Survival Hubbard said "When an auditor finds his pre-clear unusually suggestive [sic], he should be very careful what he says to the pre-clear. He may notice that a pre-clear after he closes his eyes will begin to flutter his eyelids. This is a symptom of the very lightest level of hypnotic trance." (JCA-77) However, in the current "Book One" Dianetic procedure, the auditor is to "Count slowly and soothingly from 1 to 7" until "the preclear's eyes close and you notice his eyelids flicker" (JCA-78).

36. Hubbard said that Dianetics can be used to "play on another individual like a good organist plays on a Wurlitzer ... Knowing by observation, the push buttons of another person - or, as in Political Dianetics, a society - the organist can play whatever piece he likes at will." (JCA-79)

37. Recipients of Dianetic "processing" will tend to invent "memories" (for example, believing that they are reliving birth and conception or "past lives" in extra-terrestrial societies), so causing False Memory Syndrome. The techniques of Scientology exploit this collapse of distinction between memory and imagination to induce euphoria and dependency. In "Training Routine Zero", a fundamental practice of Scientology, individuals are expected to spend "some hours" sitting immobile and staring at another similarly immobile Scientologist (JCA-80). This leads to a hypnotic state in which the Scientologist hallucinates and experiences spatial distortion. In the Scientology "process" "Opening Procedure by Duplication", the Scientology "auditor" commands the recipient to walk between two tables, picking up the book on one and the bottle on the other and guessing their weight and temperature. This procedure is received in two hour sessions, and as many as 18 sessions can be administered over a few days. The procedure leads to spatial dissociation, which the Scientologist is told indicates that he has left his human body although all of his perceptions are still channelled through it (JCA-81).

The Sea Organization

38. The Sea Organization, or Sea Org, was created by Hubbard in August 1967. According to promotional literature, "The Sea Org is the only guarantee of the survival of Scientology technology on this planet. Without the survival of Scientology technology, there is no hope for the survival of Man." (JCA-82).

39. Speaking of Sea Org members, Hubbard said "the whole value of a being is to his group and not to himself at all..." (JCA-83).

40. Hubbard asserted that the Sea Org is "fabian", and redefined that word to mean "using stratagem and delay to wear out an opponent" (JCA-84). Hubbard wanted the Sea Org to be seen as "a determined but elusive and *sometimes frightening group*". He also asserted that the Sea Org has "tough discipline", and that "Only those members who are not used heavily aboard [ship] or on mission seem to go slack." (JCA-85).

41. The Sea Org is a paramilitary organization, in which members wear pseudo-naval uniform and hold pseudo-naval ranks (JCA-86). Members also wear the equivalent of campaign ribbons (JCA-87). Scientology teaches reincarnation, and Sea Org members sign a contract for a billion years (JCA-88). Elsewhere this is styled "a pledge of eternal service". This text adds: "New Sea Org members undergo rigorous basic training ... Sea Org members, having devoted their lives to their religion, work long hours for little pay and live a communal existence" (JCA-89). The recruit gives away certain rights by signing the Sea Org contract: "I ... fully and without reservation, subscribe to the discipline, mores and conditions of this group and pledge to abide by them" (JCA-88). The Sea Org member is also expected to abide by the "Code of a Sea Org Member": "1. I promise to uphold, forward and carry out Command Intention ... 5. I promise to uphold the fact that duty is the Sea Org

Member's true motivation, which is the highest motivation there is ... 11. I promise to accept and fulfill to the utmost of my ability the responsibilities entrusted to me whatever they may be and wherever they may carry me in the line of duty ... 17. I promise through my actions to increase the power of the Sea Org and decrease the power of any enemy." (JCA-90).

"Ethics"

42. In the mid-1960s, Hubbard began to experiment on his followers with "ethics penalties" - the use of humiliating and degrading practices to enforce unthinking compliance with his orders. In the "Policy Letter", "Awards and Penalties", Hubbard outlined "penalties" that staff members must suffer, prefacing his comments with this statement "Does not apply to Sea Org which has its own, much worse." Under "Non-existence", Hubbard wrote: "Must wear old clothes. May not bathe. Women must not wear make-up or have hair-do's. Men may not shave. No lunch hour is given and such persons are expected not to leave the premises." (JCA-91). In the "Penalties for Lower Conditions", Hubbard ordered that staff in a certain "ethics condition" should be subjected to "day and night confinement to org premises." (JCA-92). This was reiterated in a subsequent "Policy Letter" (JCA-93). Speaking of his "ethics penalties", Hubbard asserted "one ex-Naval person, reading them realized suddenly, 'you could kill a man with the penalties of non-existence, by work and no sleep.'" (JCA-94).

43. In 1968, Hubbard introduced the practice of "overboarding". A photograph of this practice was published in Scientology's magazine "The Auditor", issue 41, with the caption: "Students are thrown overboard for gross out tech and bequeathed to the deep!" (JCA-95). Overboarding was used as a punishment for failure to comply exactly with Hubbard's orders. At about the same time, the tank punishment - where individuals were put into the bilge tanks and kept awake for 84 hours - and the chainlocker punishment - where individuals were put in the dark, cramped, waterlogged, rat-infested and filthy chainlocker. Witnesses have said that even children were put in the chainlocker at Hubbard's order.

The Rehabilitation Project Force

44. In 1973, Hubbard introduced the "Rehabilitation Project Force" ("RPF") (JCA-96). Disobedient Sea Org members have been assigned to the RPF from that time. The RPF replaced the "Rehabilitation Unit" (JCA-96) of which Hubbard said "The unit is worked hard during the day on a rigorous schedule...". This unit had replaced the "Mud Box Brigade" - "persons appointed to clean mud boxes, fuel lines, water lines, bilges, etc." (JCA-97). Few of the internal memoranda which apply to the RPF are publicly available. All are relevant to litigation, as they show the true character of Scientology and the inhuman pressures brought to bear upon Sea Org members. The designations for RPF material are "Executive Directive 965 Flag 'RPF Reinstated'" and all additions and "Flag Order 3434" and all additions (there are at least 56 memoranda in this series, numbered FO 3434-1 to FO 3434-56).

45. The RPF is virtually a labour and thought reform camp. Members are forbidden communication with any but their "bosun" (the head of the RPF); they have to comply immediately with any order; they sleep even shorter hours than other staff; they eat even poorer food than other staff (often rice, beans and porridge for weeks. For some time in Florida, "RPFers" were fed left-over food) (JCA-98); they sleep in "pig's berthing", i.e. without beds (JCA-99, JCA-100); they do hard labour and menial tasks, including toilet and sewer cleaning; they are rarely permitted time off; they receive one quarter of the already derisory pay of other staff (JCA-101); and they have to write down detailed "confessions", which may be published by the organization (JCA-102, JCA-103). Finally, an RPF sentence is open-ended and may last for as much as four years. Failure to comply leads to posting to the "RPFers RPF", which according to witnesses has consisted of false imprisonment. False imprisonment or "isolation" is a part of the "technology" of Scientology (JCA-104, JCA-105). There are hundreds of former members who suffered the RPF

Isolation watches

46. While aboard ship during the early 1970s, Hubbard introduced "isolation watches" where an individual is forcibly confined after a "psychotic break" (a mental breakdown, usually caused by Scientology's hypnotic procedures). Such people can be held for weeks under 24-hour guard (JCA-104, JCA-105). The procedure is referred to as "babywatching" or "babysitting" in Scientology. In 1994, The Independent newspaper in Britain published an account of "babywatching" (JCA-106). HCO Ethics Order 2543 of 28 September 1993, concerning Heidi Degro, makes it clear that the practice is still in use (JCA-105). Indeed, the practice forms a part of Scientology's incontrovertible "scripture" (JCA-104).

The Erosion of Critical Thinking

47. I have spent over ten years interviewing and counselling former Scientologists, and have come to the firm conclusion that Dianetics and Scientology tend to erode independent decision making and critical thinking. Hubbard claimed that his techniques were the only valid approach to mental and spiritual well-being. He derided all psychotherapeutic practices (JCA-107). Hubbard asserted with regard to psychology and psychiatry that "the instigators, patrons and supporters of these two subjects classify fully and demonstrably as criminals." (JCA-108). Although Scientology claims to be "open to people of all religions" (JCA-109), Hubbard asserted that heaven has been deserted for at least 43 trillion years (JCA-110), and that Christ is simply a fabrication (JCA-111).

48. The techniques of Dianetics and Scientology induce uncritical euphoria and heighten suggestibility. Scientologists are forbidden criticism of Hubbard, his organizations, his techniques, and of other Scientologists except in written reports to those organizations (JCA-112, JCA-113). Such "ethics reports" are encouraged. To even attempt to discuss the processing techniques is termed "verbal tech[nology]" and forbidden (JCA-114). Offenders are subjected to a "Committee of Evidence", a Scientology tribunal, for the commission of a "Suppressive Act" or "High Crime". Such "High Crimes" are considered the equivalent of murder (JCA-115).

49. During the first stages of involvement, a new recruit is often flattered as an exceptional individual (JCA-52) and encouraged by false claims of physical cure (e.g., JCA-21, JCA-23 to JCA-30) and psychic abilities (e.g., JCA-69, JCA-70) made in Hubbard's works and by euphoric Scientologists.

50. Scientologists are bombarded with promotional literature, magazines such as Impact, Source, Advance!, The Auditor, Communication, Certainty, Freedom, Freewinds, Good News, Inroads, Celebrity, International Scientology News and Keeping Scientology Working News. These all point to the supposedly positive and beneficial effects of Dianetics and Scientology, but avoid any mention of court decisions, medical reports, government enquiries or media pieces critical of these practices.

51. In its publications, Scientology incites hatred for anyone critical of its ideas and techniques. For example, in "Ron's Journal 34", which has frequently been reprinted, Hubbard said: "Time and again since 1950, the vested interests which pretend to run the world (for their own appetites and profit) have mounted full-scale attacks. With a running dog press and slavish government agencies the forces of evil have launched their lies and sought, by whatever means, to check and destroy Scientology. What is being decided in this arena is whether mankind has a chance to go free or be smashed and tortured as an abject subject of the power elite ... a review of these battles over the past
thirty-two years moves one to contemptuous laughter. The enemy, perched in their trees or swinging by their tails, have been about as effective as one of their psychologist's monkeys peeling a policeman's club thinking it is a banana and then throwing it only to hit the chief ape in the face ... The AMA, pouring lies into the press through gnashing teeth persevered for years - and then went bankrupt. The psychiatrist, riding high in 1959, hoping to place one of his ilk in a blackmail position behind every head of state, hoping to consign any citizen at

his whim to a psychiatric Siberia, trying to preserve his right to kill and maim as a profession above the law, is today a butt of comic strips. And what of the FDA that, for fifteen years snarled and snapped at the E-Meter? One hardly hears of them today. And what of the mighty Interpol, that tool of the CIA? It was found to be a nest of war criminals hiding out from the law itself ... You do not hear much about this from the running dog press because, of course, they were the tool of the enemy in the first place. They lose because they traffic in lies ... They are mad monkeys ... just remember a maxim: if the papers say it, it isn't true." (JCA-116).

52. Scientologists are discouraged from reading anything hostile to Scientology ("entheta") (JCA-117), and ordered not to communicate in any way with anyone critical of its teachings (JCA-2). This is quite obviously a form of mental imprisonment or psychological slavery.

53. Scientology advertising is based upon the principles of motivational research, and seeks to recruit people by bypassing their reasoning. This policy was clearly stated by Hubbard (JCA-54). In 1988, the Church of Scientology hired leading Public Relations firm Hill and Knowlton to make its advertising more effective (JCA-118).

Processing

54. Hubbard termed the hypnotic counselling procedures of Dianetics and Scientology "auditing" or "processing". Scientologists undertake some 27 "levels" consisting of hundreds of different processing procedures. Scientology practitioners are rarely, if ever, trained in psychology or psychotherapy.

55. Most processing is done with the subject, or "preclear", connected to a psychogalvanometer, described by Hubbard as a "'lie detector' as used by police and in psychology laboratories" (JCA-119). The subject is connected to the galvanometer by two hand held soup cans, which function as electrodes. The galvanometer measures variations in a small electric current passed through the subject. Where an individual is unwilling to be interrogated on the E-meter, the following practice forms a part of the "scriptures" of Scientology: "When the subject placed on a meter will not talk but can be made to hold the cans (or can be held while the cans are strapped to the soles or placed under the armpit, I am sorry if that sounds brutal, it isn't [sic]), it is still possible to obtain full information from the subject." (JCA-120).

56. During the course of auditing the individual is frequently asked to disclose guilty secrets or "withholds". The auditor writes these confessions down. According to the Bulletin "Miscellaneous Reports": "When an Auditor finds an Ethics Situation [in session reports] he should mark it and circle it in red after the session. The pc [preclear - subject] is not necessarily turned in ... but the Auditor should make mention of it ... If it is a serious situation that affects others, then it is the Auditor's responsibility to report it." (JCA-121). A copy of the report is sent to a Scientology Ethics department.

57. Scientologists are periodically subjected to confessional interrogations, where printed lists, sometimes numbering hundreds of questions, are asked (JCA-122). Scientologists pay #200 per hour for these "confessionals" (JCA-32). Confessional lists are checked with the subject connected to the "E-meter" (JCA-103). Such interrogations are now generally styled "confessionals", "integrity processing" and "eligibility confessionals" but were originally styled "security checks" or "sec checks": "In the early '60s LRH [Hubbard] developed the technology known as Sec Checking. As issued it was used for two purposes: as a general tool to clean up a pc's overts and withholds and as a security tool to detect out-ethics persons and security risks." (JCA-123). In "The Only Valid Security Check", details are requested concerning potential past misdeeds, including: shoplifting, theft, forgery, blackmail, smuggling, drunkenness, burglary, embezzlement, cannibalism, drug addiction, sexual practices and counterfeiting. There are also 21 questions relating to Hubbard, his wife and Scientology (JCA-122). A Scientology "Bulletin" says "The specific details of each misdeed must be gotten." (JCA-124).

58. In the "Hubbard Communications Manual of Justice", Hubbard said "Intelligence is mostly the collection of data on people ... It is basically a listening and filing action. It is done all the time about everything and everybody." (JCA-125). Hubbard also said "The main danger of Integrity Processing is not probing a person's past but failing to do so thoroughly. When you leave an Integrity Processing question 'live' and go on to the next one, you set up a nasty situation" (JCA-126); "Take up each reading question [i.e., each question which causes a reaction on the 'E-meter'], getting the what, when, where, all of every overt [transgression] ... Get specifics ... For security investigation purposes, get all the exact names, dates, addresses, phone numbers, and any other information that might be helpful..." (JCA-103).

59. Scientologists can also be subjected to "HCO Confessionals", where they are told that the information they give will not remain confidential: "The second use of Integrity Processing is as an ethics or security measure ... [it] can be done as a straight security action." (JCA-123). The same sets of questions are used in both forms of confessional: "The term 'I am not auditing you' only occurs when a Confessional is done for justice reasons. Otherwise the procedure is the same (By 'justice reasons' is meant when a person is refusing to come clean [sic]...) ... A Confessional done for justice reasons is not auditing and the data uncovered is not withheld from the proper authorities." (JCA-103).

60. In Church of Scientology of California v. Armstrong, Mary Sue Hubbard, former "Controller" of Scientology, admitted that she had issued Guardian's Order 161269 which orders that "processing files" - the written records of confessionals - are to be reviewed so that discreditable material in them can be used against former members (JCA-127). This despite many representations that such confessional files are confidential. In July 1977, the FBI seized many examples of such "folder culls". Former senior Scientology executives testified in the Armstrong case that folder culling was a common practice in Scientology (Laurel Sullivan, Nancy Dincalci, Kima Douglas - all of whom had worked with Hubbard, and Edward Walters, a former Guardian's Office intelligence operative) (JCA-128, JCA-129, JCA-130, JCA-131).

61. Any critisicm of Hubbard or Scientology is attributed to the critic's guilt and fear of being found out. Hubbard asserted: "Now, get this as a technical fact, not just a hopeful idea. Every time we have investigated the background of a critic of Scientology, we have found crimes for which that person or group could be imprisoned under existing law. We do not find critics of Scientology who do not have criminal pasts. Over and over we prove this." (JCA-73).

62. Should a Scientology student question any of the tenets of Scientology, he is required to look up definitions of words in the text: "The student says he does not understand something. The Supervisor has him look earlier in the text for a misunderstood word." (JCA-132); "Whenever a person has a confused idea of something or believes there is some conflict of ideas IT IS ALWAYS TRUE THAT A MISUNDERSTOOD WORD EXISTS AT THE BOTTOM OF THAT CONFUSION." (Emphasis in original, JCA-133). No-one who disagrees with Hubbard can continue in Scientology. All practices have to be adhered to absolutely. To do otherwise is regarded as a violation of "standard technology". In this way, even factual errors in Hubbard's work remain unchanged. For example, the phrase "The 14th century psychiatrist" used in the "Policy Letter" "Sanity" (JCA-134). A "course supervisor" at the Birmingham Scientology organization spent almost 30 minutes trying to persuade me that this was not a typographical error for "19th".

63. Hubbard's "Policy Letter" "Suppressive Acts...", (JCA-115), lists over 100 actions considered "High Crimes" or "Suppressive Acts" by Scientology. The list begins with "murder", making it clear how severely Scientology views the other listed actions. These include: "Public statements against Scientology"; "Testifying hostilely before state or public inquiries"; "Continued membership in a divergent group"; "Continued adherence to a person or group pronounced a suppressive person or group"; "Delivering up the person of a Scientologist without justifiable defense or lawful protest to the demands of civil or criminal law"; "Permitting students to talk to each other ... during course hours"; "to publicly depart Scientology". For committing any of these "high crimes", a

Scientologist can be expelled and "declared Suppressive" and his Scientologist friends and family forbidden further communication with him (JCA-2).

64. In training, Scientologists are subjected to an elaborate system of "checkouts" to ensure that they have exactly "duplicated" Hubbard's teachings. These include "high crime checkouts" (JCA-135). The purpose of such "checkouts" is to bring about absolute agreement with Hubbard. Should a student fail to agree with Hubbard, he will be sent first to the "Cramming" section of the organization and then, if that fails, to the "Ethics" section. No student is permitted to continue with a course beyond a disagreement, and students who disagree are separated from other students. Continued disagreement leads to expulsion from Scientology.

65. HCO Policy Letter "Policies on Physical Healing..." explains categories of people forbidden involvement with Scientology: "a. Persons intimately connected with persons ... of known antagonism to ... Scientology"; "Persons who 'want to be processed to see if Scientology works' ... News reporters fall into this category."; "Persons who 'have an open mind'" (JCA-136).

66. Scientologists are forbidden medical assistance without consent from Scientology (JCA-137). All psychotherapies and meditational practices are forbidden (JCA-138).

67. Any Scientology "Clear" can be questioned to determine which of Hubbard's claimed criteria they have obtained - for example, freedom from the common cold, a near perfect memory and the ability to do a calculation in ten or fifteen seconds that would take a "normal" person 30 minutes. The claims for "Operating Thetan levels", which come after "Clear", are stranger yet. Scientology "Operating Thetans" should be asked about their ability to leave their bodies and remotely perceive events. Demonstration should be sought. Having failed to meet Hubbard's criteria, the individual will still show absolute loyalty to Hubbard.

Retribution against litigants, critics, competitors and former members

68. The Hubbard "Policy Letter" "Suppressive Acts, Suppression of Scientology and Scientologists" (JCA-115), shows how easy it is to commit "High Crimes" or "Suppressive Acts". These include "Public disavowal of Scientology", "Public statements against Scientology", "Bringing civil suit against any Scientology organization", "Demanding the return of any or all fees", "Continued adherence to a person or group pronounced a suppressive person or group", "publicly departing Scientology" and "Violation or neglect of any of the ten points of Keeping Scientology Working" (in particular "Knowing it [Scientology "technology"] is correct", "Applying the technology", "Hammering out of existence incorrect technology"). Strictly speaking, anyone who does not know that Scientology's "technology" is correct is deemed a "Suppressive Person".

69. It is made clear in Scientology's published policy that a person expelled from Scientology is "Fair Game" (JCA-139). A "Suppressive Person declare" is Scientology's equivalent of the Shia Muslim "fatwah".

70. In "Justice, Suppressive Acts, Suppression of Scientology and Scientologists, the Fair Game Law", Hubbard asserted "By FAIR GAME is meant, without rights for self, possessions or position, and no Scientologist may be brought before a Committee of Evidence or punished for any action taken against a Suppressive Person or Group during the period that person or group is 'fair game'." (JCA-140) In this Policy Letter, we learn that "Suppressive Acts include ... 1st degree murder, arson, disintegration of persons or belongings not guilty of suppressive acts". Scientologists are thereby given leave to destroy the person and property of a "Suppressive Person".

71. Elsewhere, Hubbard carefully explained the provisions of Fair Game: A Suppressive Person "May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed." (JCA-141).

72. In 1968, Hubbard ordered that the words "Fair Game" "may not appear on any Ethics Order. It causes bad public relations." However, the practice of Fair Game was not cancelled "This ... does not cancel any policy on the treatment or handling of an SP [Suppressive Person]." (JCA-142).

73. A training checksheet used as evidence in the conviction of eleven Scientology officials in the US (including Hubbard's wife and immediate deputy), shows that the 1 March 1965 "Policy Letter" (JCA-140) still formed part of a secret course for Scientology harassment operatives (members of "Branch One" of the "Guardian's Office" of Scientology) (JCA-143, p.18, second item).

74. When the nominal head of Scientology's "Guardian's Office", Jane Kember, and the head of Scientology Intelligence, Morris Budlong, were sentenced to imprisonment in the United States, in 1980, the sentencing memorandum included this statement: "Defendants, through one of their attorneys, have stated that the fair game policy continued in effect well after the indictment in this case and the conviction of the first nine co-defendants. Defendants claim that the policy was abrogated by the Church's Board of Directors in late July or early August, 1980." (JCA-144, footnote p.16).

75. The "Policy Letter" which allegedly cancelled "fair game" in 1980 (JCA-139), was itself cancelled by a Policy Letter of 8 September 1983 (JCA-145). As such, Fair Game is an incontrovertible "scripture" of the Churches of Scientology (JCA-46, JCA-47, JCA-48), even though the words "fair game" are no longer used to describe the practice (JCA-142).

76. Mr. Justice Latey ruled in the High Court in London, in July 1984, that "Deprival of property, injury by any means, trickery, suing, lying or destruction have been pursued throughout and to this day with the fullest possible vigour ... The 'Church' resorts to lies and deceit whenever it thinks it will profit it to do so." (JCA-146).

77. In Wollersheim v. Church of Scientology of California (the "mother church" of the Churches of Scientology at the time the suit was filed), the California Appeal Court ruled, in a decision upheld by the US Supreme Court: "Wollersheim was compelled to abandon his wife and his family through the policy of disconnect. When his mental illness reached such a level he actively planned his suicide, he was forbidden to seek professional help. Finally, when Wollersheim was able to leave the Church, it subjected him to financial ruin through its policy of 'fair game'." (JCA-147, pp.A-7, 15 & 16). At appeal, Scientology asserted that "fair game" was a "core practice of Scientology", and therefore protected as "religious expression". This position was also made on behalf of Scientology in the case against Gerald Armstrong, in 1984, by religious expert Dr. Frank Flinn (JCA-45).

78. In the same case (Church of Scientology of California v. Armstrong) (JCA-7), Judge Paul Breckenridge criticised the continued use of Fair Game, showing that the policy had remained in force beyond the supposed cancellation in 1980. Judge Breckenridge said: "In addition to violating and abusing its own members' civil rights, the [Scientology] organization over the years with its 'Fair Game' doctrine has harassed and abused those persons not in the Church whom it perceives as its enemies." Judge Breckenridge added, "After the within suit was filed ... Defendant Armstrong was the subject of harassment, including being followed and surveilled by individuals who admitted employment by Plaintiff; being assaulted by one of these individuals; being struck bodily by a car driven by one of these individuals; having two attempts made by said individuals apparently to involve Defendant Armstrong in a freeway automobile accident; having said individuals come onto Defendant Armstrong's property, spy in his windows, create disturbances, and upset his neighbors".

79. Fair Game has long been a policy of Scientology. In 1955 Hubbard wrote, speaking of practitioners of Scientology not licensed by him: "The law can be used very easily to harass ... if possible, of course, ruin him utterly" (JCA-27, p.157). Hubbard also wrote, "If attacked on some vulnerable point by anyone or anything or any organization, always find or manufacture enough threat against them to cause them to sue for peace." (JCA-148).

80. In 1965, Hubbard wrote in Scientology's "Auditor" magazine: "Principals of the Victorian government such as the 'Prime Minister', Anderson the 'Q.C.' and hostile members of the 'Victorian Parliament' are continued as suppressive persons and they and their families and connections may not be processed or trained and are fair game." (JCA-149)

81. Current Scientology "scriptures" attribute only negative qualities to "Suppressive Persons" (JCA-150). Between 1983 and 1992, the number of people ajudged "Suppressive Persons" by Scientology increased from 600 (JCA-1) to 2,400 (JCA-151). According to Scientology leader David Miscavige, the next section of Hubbard's supposed psychotherapy - Operating Thetan Course Section 9 - will not be released until "ethics is fully gotten in on the SPs [Suppressive Persons]" (JCA-152). This means that all critics of Scientology must be silenced. In light of the "scripture" of "Fair Game", the interpretation of this order to all Scientologists can only be alarming.

82. The lengths to which Scientologists will go to harass opponents are shown by a Hubbard lecture, still distributed within Scientology, where Hubbard boasted of the creation of his intelligence agency the "Guardian's Office", and its infiltration of newspapers, international banks and even the British government: "With all of this action being taken against us in the last 17 years ... it was vitally necessary that I isolate who it was on this planet who was attacking us ... The Organization, under the direction of Mary Sue [Hubbard], ... employed several professional intelligence agents who had long and successful professional backgrounds and they looked into this matter for us and the results of their activities - although still in progress - have told us all we needed to know with regard to any enemy we had on this planet. Our enemies on this planet are less than 12 men. They are members of the Bank of England, and other higher financial circles. They own and control newspaper chains and they are oddly enough directors in all the Mental Health groups in the world ... Wilson ... the current premier of England [sic] is totally involved with these fellows ... They have collected rather interesting files on us ... and their orders concerning what to do about this as part of their files all makes very interesting reading. We of course have full copies of their files. It was, of course, their bad luck to tangle with someone who had been trained in the field of intelligence by the allied governments, which is myself and they had insufficient security and insufficient loyalty amongst their own people to keep out the intelligence agents which we sent against them." (JCA-153).

83. Ten years after Hubbard initiated the practice of infiltration and theft, Churches of Scientology in the US were raided. This led to the conviction and imprisonment of eleven Scientology officials (JCA-154). Almost forty others were cited as "unindicted co-conspirators", including Hubbard (JCA-155). Similar events led to convictions in Canada in 1992.

84. The sentencing memorandum in USA v. Mary Sue Hubbard et al makes clear the scale of the offences committed by Hubbard's agents: "The United States initiated the investigation which resulted in the instant indictment in view of the brazen, systematic and persistent burglaries of United States Government offices in Washington, D.C., and Los Angeles, California, over an extended period of at least some two years. Additionally, the United States was confronted with the pervasive conduct of the defendants in this case in thwarting a federal Grand Jury investigation by harboring a fugitive, in effect forcefully kidnapping a witness who had decided to surrender to the federal authorities, submitting false evidence to the Grand Jury, destroying other evidence which might have been of valuable aid to its investigation, preparing a cover-up story, and encouraging and drilling a crucial witness to give false testimony under oath to that Grand Jury ... a review of the documents seized in the ... searches ... show the incredible and sweeping nature of the criminal conduct of the defendants and of the organization which they led. These crimes include infiltration and theft of documents from a number of prominent private national and world organizations, law firms and newspapers; the execution of smear campaigns and baseless law suits to destroy private individuals who had attempted to exercise their First Amendment rights to freedom of expression; the framing of private citizens who had been critical of Scientology, including the forging of documents which led to the indictment of at least one innocent person; violation of the

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civil rights of prominent private figures and public officials. These are but a few of the criminal acts not covered in the 'uncontested' stipulation of evidence ... defendant Heldt's assertion that 'the policy of the Church prohibits any illegality on the part of its members or staff...' is totally unfounded and incorrect. The evidence in this case ... establish[es] beyond peradventure that the Church and its leadership had, over the years, approved, condoned and engaged in gross and widespread illegality. One, indeed, wonders how it can even be suggested that the defendants and their organization did not make illegal activities part and parcel of their daily work." (JCA-154).

Scientology's attitude towards the Courts

85. The scriptures of Scientology show little respect for the judicial system. In 1965, Hubbard wrote "Don't react to Scientology Ethics as though it were 'wog' law. In society's 'courts' one is given the works and truth has little bearing on the findings. A mean judge or clever attorney and small legal errors decide a lot of their cases. Wog courts are like throwing dice. There is huge cost and publicity and punishment galore even for the innocent." (JCA-156). In another 1965 "Policy Letter", Hubbard said "Want to know why wog courts make people nervy? Who can predict a wog court decision? Who can even predict the sentence man to man for the same crime?" (JCA-157).

86. The second edition of What is Scientology? contains a section comparing "Scientology justice" to "wog law", which says that the "justice system is bogged down in a morass of Latinized grammatical complexities and has become, sadly, a matter of which attorney can present the better argument. Right and wrong, guilt and innocence are relegated to bit players in the show. A lawyer defending a criminal on trial for armed robbery, for instance, is not interested in establishing guilt or innocence; he is looking for a loophole or technicality on which the case can be dismissed and his client set free whether guilty or not. Few have the wealth necessary or even try to pursue justice through the courts and even if one prevails, attorney costs often make it a Pyrrhic victory. The due process of the court system is in a virtual gridlock of motions, countermotions, depositions, injunctions, appeals, claims and counterclaims." (JCA-158).

87. In a statement recusing himself from a Scientology case, California judge James Ideman said "The past eight years have consisted mainly of a prolonged, and ultimately unsucessful, attempt to persuade or compel the plaintiff to comply with lawful discovery. These efforts have been fiercely resisted by plaintiffs. They have utilized every device that we on the District Court have ever heard of to avoid such compliance, and some that are new to us. This noncompliance has consisted of evasions, misrepresentations, broken promises and lies, but ultimately with refusal. As part of this scheme to not comply, the plaintiffs have undertaken a massive campaign of filing every conceivable motion (and some inconceivable) to disguise the true issue in these pretrial proceedings. Apparently viewing litigation as war, plaintiffs by this tactic have had the effect of massively increasing the costs to the other parties, and, for a while, to the Court ... The scope of the plaintiffs' efforts have to be seen to be believed ... 1,737 filings [were made by Scientology] ... Yet it is almost all puffery -- motions without merit or substance." (JCA-159).

88. In the "scriptures" of Scientology, Hubbard wrote: "the law can be used very easily to harass." The December 1980 issue of "The American Lawyer" makes it clear that this policy has extended to judges in trials involving Scientology (JCA-160).

89. As part of their membership contract, Scientologists are compelled to sign the "Pledge to Mankind", first issued in 1984, which reads in part "In the United States ... we are the targets of unprincipled attacks in the court system by those who would line their pockets from our hard won coffers. Bigots in all branches of government ... are bent on our destruction through taxation and repressive legislation. We have been subjected to illegal heresy trials in two countries before prejudiced and malinformed judges who are not qualified or inclined to perceive the truth." (JCA-161).

90. A 1985 issue of the Scientology magazine "Impact" carries the following account: "Rev. Ken Hoden ... President of the Church of Scientology of California recently won a motion in Los Angeles that allowed the Church to rebring an important Federal Lawsuit. After one of the Church attorneys was arrested on the charge of contempt of court and another escorted out of the Courtrooms by order of a suppressive Judge ... Rev. Hoden got up. He argued before the judge for a full twenty minutes. He had effectively picked up the ball and gave a most moving, pro-Church and anti-suppression speech, right to the face of the suppression: the judge in the case." (JCA-162)

Counselling

91. Since 1983, I have counselled tens of former Scientologists and been appalled by a succession of accounts of financial and psychological devastation. I have met individuals who borrowed money under false pretences, bankrupted businesses to pay immense amounts for Scientology "auditing", and abandoned spouses and even small children to pursue Scientology. I have also counselled individuals who had left Scientology as much as 20 years before and who had been plagued by guilt and a sense of inadequacy induced by Scientology and its techniques of psychological domination. Scientology is especially dangerous to those with incipient mental illness. I have counselled two individuals who were first committed to mental hospitals after encountering Scientology and been consulted by the staff of a psychiatric hospital in a third case. A California Appeal Court judgment, upheld by the US Supreme Court, shows that Scientology brought about manic depression and suicidal tendencies in former member Lawrence Wollersheim (JCA-147, p.A-2).

92. The promises of Dianetics and Scientology are so attractive, the counselling procedures so invasive and the selling techniques so forceful that former members can take years to see them as simply techniques of psychological domination. U.S. academics Conway and Siegelman, who studied 400 former cult members from 48 groups, concluded that Scientology has "the most debilitating set of rituals of any cult in America ... although claiming the most severe long-term effects, former Scientologists surveyed reported the lowest total of hours per week spent in ritual and indoctrination." Conway and Siegelman approximated the time for unaided recovery at 12.5 years (JCA-163). My own experiences as a counsellor bear this out.

I declare under the penalty of perjury under the laws of the United States of America and the United Kingdom that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Radcliffe-on-Trent, England, this 9th day of April, 1995,

J. Caven-Atack

Jonathan Caven-Atack